

Exhibit A

**Expedited Motion for Order Under 11 U.S.C. § 546(c) And Amended
Reclamation Procedures Order Classifying Reclamation Claims As
General Unsecured Nonpriority Claims For All Purposes
(Docket No. 16663)**

Hearing Date and Time: June 16, 2009 at 10:00 a.m. (prevailing Eastern time)
Objection Deadline: June 12, 2009 at 4:00 p.m. (prevailing Eastern time)

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
DELPHI CORPORATION, <u>et al.</u> ,	: Case No. 05-44481 (RDD)
Debtors.	: (Jointly Administered)
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**NOTICE OF EXPEDITED MOTION FOR ORDER UNDER 11 U.S.C. § 546(c) AND
AMENDED RECLAMATION PROCEDURES ORDER CLASSIFYING RECLAMATION
CLAIMS AS GENERAL UNSECURED NONPRIORITY CLAIMS FOR ALL PURPOSES**

PLEASE TAKE NOTICE that on June 5, 2009, Delphi Corporation ("Delphi")
and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-

captioned cases (collectively, the "Debtors"), filed the Expedited Motion For Order Under 11 U.S.C. § 546(c) And Amended Reclamation Procedures Order Classifying Reclamation Claims As General Unsecured Nonpriority Claims For All Purposes (the "Motion").

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on June 16, 2009 at 10:00 a.m. (prevailing Eastern time) (the "Hearing") before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, Room 610, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and the Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered by this Court on March 20, 2006 (Docket No. 2883) (the "Supplemental Case Management Order"), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hard-copy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Att'n: General Counsel), (ii) counsel to the Debtors, Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Att'n: John Wm. Butler, Jr.), (iii) counsel to JPMorgan Chase Bank N.A., Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Att'n:

Donald Bernstein and Brian Resnick), (iv) counsel for the official committee of unsecured creditors, Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022 (Att'n: Robert J. Rosenberg and Mark A. Broude), and (v) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Att'n: Brian Masumoto), in each case so as to be **received** no later than **4:00 p.m. (prevailing Eastern time) on June 12, 2009**.

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Supplemental Case Management Order will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served

in accordance with the procedures set forth herein and in the Supplemental Case Management Order, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: New York, New York
June 5, 2009

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UNITED STATES BANKRUPTCY COURT
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In re	:	Chapter 11
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DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
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	:	(Jointly Administered)
Debtors.	:	
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EXPEDITED MOTION FOR ORDER UNDER 11 U.S.C. § 546(c) AND AMENDED
RECLAMATION PROCEDURES ORDER CLASSIFYING RECLAMATION CLAIMS
AS GENERAL UNSECURED NONPRIORITY CLAIMS FOR ALL PURPOSES

("MOTION TO DETERMINE RECLAMATION CLAIMS")

Delphi Corporation ("Delphi") and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), hereby submit this expedited motion (the "Motion") for an order pursuant to 11 U.S.C. § 546(c) and the Second Amended And Restated Final Order Under 11 U.S.C. §§ 362, 503, And 546 And Fed. R. Bankr. P. 9019 Establishing Procedures For Treatment Of Reclamation Claims (Docket No. 10409) (the "Amended Reclamation Procedures Order") classifying the claims against the Debtors' estates identified in Exhibit A¹ attached hereto (the "Reclamation Claims") as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization, and respectfully represent as follows:

Preliminary Statement

1. The Reclamation Claims are not entitled to administrative expense priority due to the Debtors' prepetition secured lenders' prior liens on the goods to be reclaimed. Consequently, the Reclamation Claims, to the extent they are or become fixed and allowed claims, should be treated as general unsecured claims under any modifications to the Confirmed Plan (as defined below) or any plan of reorganization of the Debtors.
2. It is well established in this district under the decisions rendered in the In re Dana Corp. and In re Dairy Mart Convenience Stores, Inc. cases that reclamation claims are subject to the superior rights of a holder of a prior perfected security interest in the reclaimed

¹ Certain of the Reclamation Claims have been transferred to third parties as part of a transfer of a proof of claim or scheduled liability pursuant to rule 3001(e) of the Federal Rules of Bankruptcy Procedure. Accordingly, Exhibit A lists both the party that asserted the Reclamation Claim during the window established by 11 U.S.C. § 546(c) and, where a Reclamation Claim has been transferred, the current holder of the Reclamation Claim.

goods. See In re Dana Corp., 367 B.R. 409, 420-21 (Bankr. S.D.N.Y. 2007);² In re Dairy Mart Convenience Stores, Inc., 302 B.R. 128, 134-36 (Bankr. S.D.N.Y. 2003).

3. As was the case in Dana and Dairy Mart, the goods subject to the Reclamation Claims constituted the collateral of the Debtors' prepetition secured lenders. On January 5, 2007, this Court approved the Debtors' refinancing of its postpetition secured financing which, on closing, satisfied the prepetition secured lenders' liens and simultaneously granted first priority security interests in, and liens on, all of the prepetition collateral, including the reclaimed goods, in favor of the Debtors' postpetition secured lenders. Accordingly, the Debtors effectively disposed of the reclaimed goods upon closing of the Debtors' Court-approved postpetition financing, thus terminating any interest the Reclamation Claimants may have had in the reclaimed goods. The Reclamation Claims are, therefore, not entitled to administrative priority under section 546(c) of the Bankruptcy Code.

4. Based on the foregoing and for the reasons set forth below, the Debtors request entry of an order classifying the Reclamation Claims as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization.

Background

A. The Chapter 11 Filings

5. On October 8 and 14, 2005, the Debtors filed voluntary petitions in this Court for reorganization relief under chapter 11 of title 11 of the United States Code, 11 U.S.C.

² The Dana court specifically dealt with reclamation claims asserted in a chapter 11 case commenced after the enactment of the Bankruptcy Abuse Prevention and Consumer Protection Act ("BAPCPA"). Nonetheless, the reasoning outlined by the Dana court has equal force with respect to section 546(c) as it existed prior to the enactment of BAPCPA. See Dana, 367 B.R. at 418 (finding that amended section 546(c) under BAPCPA does not create new federal right of reclamation and analyzing pre-BAPCPA case law regarding application of prior lien defense). See also In re Advanced Mktg. Servs., Inc., 360 B.R. 421, 426 n.6 (Bankr. D. Del. 2007) ("[t]he Court would reach the same result under section 546(c) as it existed prior to BAPCPA").

§§ 101-1330, as then amended (the "Bankruptcy Code"). The Debtors continue to operate their businesses and manage their properties as debtors-in-possession under Bankruptcy Code sections 1107(a) and 1108. This Court has ordered joint administration of these cases.

6. No trustee or examiner has been appointed in these cases. On October 17, 2005, the Office of the United States Trustee (the "U.S. Trustee") appointed an official committee of unsecured creditors (the "Creditors' Committee"). On April 28, 2006, the U.S. Trustee appointed an official committee of equity holders, which was disbanded on April 24, 2009. On February 26, 2009, the U.S. Trustee appointed an official committee of retired employees to represent certain of the Debtors' current active salaried employees, retirees, and their spouses for certain limited purposes.

7. On December 10, 2007, the Debtors filed the First Amended Joint Plan Of Reorganization Of Delphi Corporation And Certain Affiliates, Debtors And Debtors-In-Possession (Docket No. 11386) (the "Plan") and the First Amended Disclosure Statement with respect to the Plan (Docket No. 11388) (the "December 10 Disclosure Statement"). The Court subsequently entered an order approving the adequacy of the December 10 Disclosure Statement and granting the related solicitation procedures motion (Docket No. 11389). On January 25, 2008, the Court entered an order confirming the Plan (as modified) (Docket No. 12359) (the "Confirmation Order"), and the order became final on February 4, 2008. Although the Debtors on April 4, 2008 had satisfied the conditions required to substantially consummate the Plan, as confirmed by this Court (the "Confirmed Plan"), including obtaining \$6.1 billion of exit financing, Delphi's Plan Investors (as defined in the Confirmed Plan) refused to participate in a closing that was commenced but not completed and refused to fund their Investment Agreement

(as defined in the Confirmed Plan) with Delphi.³ On May 16, 2008, Delphi filed complaints for damages and specific performance against the Plan Investors and related parties who refused to honor their equity financing commitments or participate in the closing that would have led to Delphi's successful emergence from chapter 11. Since that time, however, the Debtors nevertheless have continued to work with their stakeholders to achieve their goal of emerging from chapter 11 as soon as practicable. On October 3, 2008, Delphi filed a motion (Docket No. 14310) (the "Plan Modification Motion") under 11 U.S.C. § 1127 for an order approving (i) certain modifications to the Confirmed Plan and December 10 Disclosure Statement and (ii) related procedures for re-soliciting votes on the Confirmed Plan, as modified. In light of the unprecedented decline in global automotive production volumes and the deepening of the crisis in global debt and equity markets, the Debtors adjourned the hearing on the Plan Modification Motion several times. On June 1, 2009 the Debtors filed a supplement to the Plan Modification Motion amending and restating the relief sought in the Plan Modification Motion (the "Motion Supplement"). Among other things, the Motion Supplement seeks approval of (i) certain modifications to the Confirmed Plan (the "Modified Plan"), (ii) a supplement to the Disclosure Statement (the "Disclosure Statement Supplement"), and (iii) procedures for re-soliciting votes on the Modified Plan. The Motion Supplement is scheduled to be heard on June 10, 2009.

8. This Court has jurisdiction over this motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding under 28 U.S.C. § 157(b)(2).

³ Although two parties-in-interest (the Creditors' Committee and Wilmington Trust Company, as indenture trustee) commenced actions to revoke the Confirmation Order, those adversary proceedings have been stayed indefinitely by stipulated orders between those parties and the Debtors. In addition, at the confirmation hearing the Court reserved for itself the remedy of vacating the Confirmation Order (*see* Hr'g Tr., 45, 67-68, Jan. 17, 2008), which is a power available to the Court to address a result that is either fundamentally unfair or is the product of an abuse of process.

9. The statutory predicates for the relief requested herein are sections 363 and 364 of the Bankruptcy Code and rule 6004(h) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

B. Current Business Operations Of The Debtors

10. Delphi and its subsidiaries and affiliates (collectively, the "Company") as of December 31, 2008 had global net sales of \$18.1 billion and global assets of approximately \$10.3 billion.⁴ At the time of its chapter 11 filing, Delphi ranked as the fifth largest public company business reorganization in terms of revenues and the thirteenth largest public company business reorganization in terms of assets. Delphi's non-U.S. subsidiaries are not chapter 11 debtors and have continued their business operations without supervision from the Court.⁵

11. The Company is a leading global technology innovator with significant engineering resources and technical competencies in a variety of disciplines, and is one of the largest global suppliers of vehicle electronics, transportation components, integrated systems and modules, and other electronic technology. The Company supplies products to nearly every major global automotive original equipment manufacturer ("OEM").

12. Delphi was incorporated in Delaware in 1998 as a wholly owned subsidiary of General Motors Corporation ("GM"). Prior to January 1, 1999, GM conducted the Company's business through various divisions and subsidiaries. Effective January 1, 1999, the assets and liabilities of these divisions and subsidiaries were transferred to the Company in

⁴ The aggregated financial data used herein generally consists of consolidated information from Delphi and its worldwide subsidiaries and affiliates as disclosed in the Company's Form 10-K filed on March 3, 2009.

⁵ On March 20, 2007, Delphi Automotive Systems Espana S.L. ("DASE"), whose sole operation is a non-core automotive component plant in Cadiz, Spain, filed a "Concurso" application for a Spanish insolvency proceeding, which was approved by the Spanish court on April 13, 2007. On July 4, 2007, DASE, its Concurso receivers, and the Cadiz workers councils and unions reached a settlement on a social plan, the funding of which was approved by this Court on July 19, 2007. The Spanish court approved the social plan on July 31, 2007. The Concurso proceeding is consistent with Delphi's transformation plan to optimize its manufacturing footprint and to lower its overall cost structure.

accordance with the terms of a Master Separation Agreement between Delphi and GM. In connection with these transactions, Delphi accelerated its evolution from a North American-based, captive automotive supplier to a global supplier of components, integrated systems, and modules for a wide range of customers and applications. Although GM is still the Company's single largest customer, today more than two-thirds of Delphi's revenue is generated from non-GM sources.

C. Events Leading To The Chapter 11 Filing

13. In the first two years following Delphi's separation from GM, the Company generated approximately \$2 billion in net income. Every year thereafter, however, with the exception of 2002, the Company has suffered net operating losses. In calendar year 2004, the Company reported a net loss of approximately \$4.8 billion on \$28.6 billion in net sales.⁶ Reflective of a continued downturn in the marketplace, in 2005 Delphi incurred net losses of approximately \$2.4 billion on net sales of \$26.9 billion. Moreover, in 2006 the Debtors incurred a net loss of \$5.5 billion, \$3.0 billion of which comprised charges related to the U.S. employee special attrition programs, and in 2007, the Debtors incurred a net loss of \$3.1 billion. Although the Debtors recorded a net gain of \$3.0 billion in 2008, which incorporated a recorded gain of \$5.3 billion in connection with the effectiveness of the Amended GSA (as defined below), the Company's net operating loss for the year was \$1.5 billion.

14. The Debtors believe that the Company's financial performance was deteriorating from the spinoff to the petition date because of (i) increasingly unsustainable U.S. legacy liabilities and operational restrictions preventing the Debtors from exiting non-profitable,

⁶ Reported net losses in calendar year 2004 reflect a \$4.1 billion tax charge, primarily related to the recording of a valuation allowance on U.S. deferred tax assets as of December 31, 2004. The Company's net operating loss in calendar year 2004 was \$482 million.

non-core operations, all of which had the effect of creating largely fixed labor costs, (ii) a competitive U.S. vehicle production environment for domestic OEMs resulting in the reduced number of motor vehicles that GM produces annually in the United States and related pricing pressures, and (iii) increasing commodity prices.

15. In light of these factors, the Company determined that it would be imprudent and irresponsible to defer addressing and resolving its U.S. legacy liabilities, product portfolio, operational issues, and forward-looking revenue requirements. Because discussions with its major stakeholders had not progressed sufficiently by the end of the third quarter of 2005, the Company commenced these chapter 11 cases for its U.S. businesses to complete its transformation plan and preserve value for its stakeholders.

D. The Debtors' Transformation Plan

16. On March 31, 2006, the Company outlined the key tenets of a transformation plan that it believed would enable it to return to stable, profitable business operations. The Debtors stated that they needed to focus on five key areas: first, modifying the Company's labor agreements to create a competitive arena in which to conduct business; second, concluding their negotiations with GM to finalize GM's financial support for the Debtors' legacy and labor costs and to ascertain GM's business commitment to the Company; third, streamlining their product portfolio to capitalize on their world-class technology and market strengths and make the necessary manufacturing alignment with their new focus; fourth, transforming their salaried workforce to ensure that the Company's organizational and cost structure is competitive and aligned with its product portfolio and manufacturing footprint; and fifth, devising a workable solution to their pension situation.

E. Plan Confirmation And Postconfirmation Matters

17. The Confirmed Plan is based upon a series of global settlements and compromises that involve nearly every major constituency in the Debtors' reorganization cases, including Delphi's labor unions and GM. The effectiveness of certain of these agreements, including the Debtors' two comprehensive agreements with GM (the "Original GSA" and the "Original MRA"), was conditioned on consummation of the Confirmed Plan. After the Plan Investors refused to fund their obligations under the Investment Agreement, as the Debtors continued working with their stakeholders to evaluate their options to emerge from chapter 11, the Debtors sought approval of two comprehensive agreements with GM: the Amended and Restated Global Settlement Agreement (the "Amended GSA") and the Amended and Restated Master Restructuring Agreement (the "Amended MRA"). On September 26, 2008, this Court entered an order authorizing the Debtors' implementation of the Amended GSA and the Amended MRA, the provisions of which became effective on September 29, 2008.

18. Through the Amended GSA and Amended MRA, the Debtors addressed, at least in part, two goals of their Transformation Plan: (i) obtaining financial support from GM for certain of Delphi's legacy and labor costs and GM's business commitments to Delphi going forward and (ii) working to solve Delphi's pension funding situation. Under the Amended GSA and Amended MRA, GM agreed to contribute substantial additional value to the Debtors and eliminate significant elements of conditionality to the performance of GM's obligations. Delphi estimated the value of the net consideration received under the Amended GSA and Amended MRA to be approximately \$10.6 billion (increased from approximately \$6.0 billion under the Original GSA and Original MRA).

19. As a result of all the factors described above, during the fall of 2008 the Debtors were able to formulate certain modifications to the Confirmed Plan which were set forth

in the Plan Modification Motion. Since the filing of the proposed modifications, however, substantial uncertainty and a significant decline in capacity in the credit markets, the global economic downturn generally, and the current economic climate in the automotive industry adversely impacted Delphi's ability to develop a revised recapitalization plan and successfully consummate a confirmed plan of reorganization. Moreover, as a result of the market turbulence, the Debtors were unable to extend the maturity date of their DIP credit facility on terms reasonably acceptable to the Debtors and their other stakeholders. Accordingly, with the support of the agent and the requisite lenders to the DIP credit facility, the Debtors entered into an accommodation agreement (as subsequently amended) which allows the Debtors, among other things, to continue using certain of the proceeds of the postpetition financing facility through June 30, 2009. In addition, to further support the Debtors' liquidity, GM agreed to make certain advances and to accelerate payment of certain payables to the Debtors, including entry into an amended and restated agreement as of June 1, 2009, to provide the Debtors up to \$250 million of additional pre-emergence liquidity through July 31, 2009 to support Delphi's transformation plan and its reorganization plan.

20. Also on June 1, 2009, while facing the most difficult economic period in decades with the most precipitous drop in U.S. vehicle sale volumes in half a century, Delphi reached an agreement to effect its emergence from chapter 11 through a transaction with Parnassus Holdings II, LLC ("Parnassus"), an affiliate of Platinum Equity, and with the support of GM Components Holdings LLC ("GM Components"), an affiliate of GM. In the exercise of the Debtors' fiduciary responsibilities to maximize the value of their estates for the benefit of all of their creditors, the Debtors executed the agreement to reflect the foregoing transactions

through a plan of reorganization. The agreement and the changes to the Confirmed Plan were filed as part of the Motion Supplement on June 1, 2009.

21. Ultimately, this emergence structure is similar to that which was contemplated in the Confirmed Plan. Instead of having a plan investor sponsoring their plan and emerging as the majority owner of the continuing business enterprise, however, Delphi has agreed to contemporaneously effectuate transactions through which Parnassus will operate Delphi's U.S. and non-U.S. businesses going forward with emergence capital and capital commitments of approximately \$3.6 billion and without the labor-related legacy costs associated with the North American sites that, together with Delphi's global Steering business, are being acquired by GM Components Holding LLC. A new company, DPH Holdings Co., will emerge as a reorganized entity that retains certain other residual non-core and non-strategic assets and liabilities that are expected to be divested over time.

22. Consummation of these transactions through the Modified Plan, which embodies concessions made by parties-in-interest to resolve these chapter 11 cases, will provide for the satisfaction of all of the Debtors' administrative claims, secured claims, and priority claims and a distribution to holders of general unsecured claims. Moreover, Delphi's emerging businesses will continue to develop technology and products and produce them for the benefit of their customers under the guidance of Platinum, which has experience providing operational support to companies to help them create long term value. In the meantime, Delphi will marshal all of its resources to continue to deliver high-quality products to its customers globally. Additionally, the Company will seek to preserve and continue the strategic growth of its non-U.S. operations and maintain its prominence as one of the world's premier auto suppliers.

Relief Requested

23. By this Motion, the Debtors seek entry of an order under section 546(c) of the Bankruptcy Code and paragraph 2(c)(iii) of the Amended Reclamation Procedures Order classifying the Reclamation Claims as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization of the Debtors.

Basis For Relief

24. The relief requested in this Motion is warranted in light of the disposition of the Prepetition Collateral (as defined below), including goods subject to reclamation demands, which has resulted in the effective disposition of the reclaimed goods in favor of the DIP Lenders (as defined below). By minimizing the amount of priority claims against the Debtors' estates, the proposed relief would facilitate the Debtors' restructuring efforts. Moreover, by requesting this relief, the Debtors are implementing certain rights and defenses granted to them under to the Reclamation Procedures Order and the Amended Reclamation Procedures Order.

The Reclamation Claims And Reclamation Procedures

F. Existing Reclamation Procedures

25. On November 4, 2005, this Court entered an order⁷ (the "Reclamation Procedures Order") establishing procedures for resolving reclamation claims. Among other things, the Reclamation Procedures Order required the Debtors to provide each Reclamation Claimant with a so-called statement of reclamation (each, a "Statement of Reclamation") setting forth the extent and basis, if any, upon which the Debtors believed the Reclamation Claimant's

⁷ (See Amended Final Reclamation Order Under 11 U.S.C. §§ 362, 503, And 546 And Fed. R. Bankr. P. 9019 Establishing Procedures For The Treatment of Reclamation Claims (Docket No. 881).)

reclamation claim was not legally valid. In addition, paragraph 2(b)(ii) of the Reclamation Procedures Order required that each such Statement of Reclamation identify any defenses that the Debtors chose to reserve. In accordance with paragraph 2(b)(ii) of the Reclamation Procedures Order, the Debtors reserved the right in the Statement of Reclamation provided to each Seller to reduce or disallow a reclamation claim if the goods and/or the proceeds from the sale of the goods are or were subject to a valid security interest (the "Prior Lien Defense," and together with the Debtors' other reserved defenses, the "Reserved Defenses").

26. On October 1, 2007, at the Debtors' request, this Court entered the Amended Reclamation Procedures Order, which amended and restated the Reclamation Procedures Order in conjunction with the Confirmed Plan.⁸ Under the amended procedures (the "Amended Procedures"), each holder of a Reclamation Claim (each, a "Reclamation Claimant") was given the choice to elect for its Reclamation Claim the treatment afforded to allowed general unsecured claims under the Confirmed Plan (which included postpetition interest on the allowed amount of the claim) rather than have the Debtors seek a judicial determination that Reclamation Claims were not entitled to priority treatment because of the Prior Lien Defense. If a Reclamation Claimant elected to decline the treatment afforded to general unsecured creditors, then a hearing on that Reclamation Claimant's reclamation claim was to be automatically adjourned to a contested hearing to be held after the effective date of the Confirmed Plan. The parties were to litigate before this Court to determine whether the Prior Lien Defense applied to that Reclamation Claimant's Reclamation Claim. In addition, the Debtors were to retain all other Reserved Defenses with respect to such Reclamation Claims. To make this selection and request treatment of its Reclamation Claim as a general unsecured claim, the Reclamation Claimant was

⁸ Paragraph 2(b)(ii) in the Reclamation Procedures Order is identical to paragraph 2(b)(ii) in the Amended Reclamation Procedures Order.

required to so mark and return an election notice provided to Reclamation Claimants as part of the solicitation materials for the Confirmed Plan by the voting deadline on the Confirmed Plan.

G. Assertion Of Prior Lien Defense

27. In light of the current economic environment and their consideration of further supplemental plan modifications, the Debtors have determined to assert the Prior Lien Defense now rather than after emergence from chapter 11. Pursuant to paragraph 2(c)(iii) of the Amended Reclamation Procedures Order, in the event that no consensual resolution of a reclamation demand can be reached, the Debtors are required to file a motion for determination of such reclamation demands. To comply with that provision, the Debtors have filed this Motion to assert the Prior Lien Defense and request an order classifying the Reclamation Claims as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization.

28. Obtaining an order of this Court respecting the Prior Lien Defense at this time rather than following emergence would eliminate any uncertainty regarding the classification of the asserted Reclamation Claims and obviate the need to maintain a reserve for the Reclamation Claims in a modified Confirmed Plan or any other plan of reorganization of the Debtors. Thus, a determination by this Court that the Reclamation Claims should be treated as general unsecured claims and not as priority claims will facilitate the Debtors' restructuring efforts.

H. The Reclamation Claims

29. Creditors asserted 855 reclamation demands against the Debtors' estates during these chapter 11 cases, asserting an aggregate amount of approximately \$282.7 million. Such creditors asserted written reclamation demands during the window established by section 546(c) of the Bankruptcy Code at a time when the goods were un-reclaimable due to the pre-

existing blanket lien on such goods held by the Prepetition Secured Lenders (as defined below). As of the date of this Motion, 505 reclamation demands (the "Disallowed Reclamation Demands") asserting an aggregate amount of approximately \$163 million have been resolved in the amount of zero, either pursuant to a letter agreement (each, a "Reclamation Letter Agreement") entered into between the Debtors and the reclaiming party, by default pursuant to the Reclamation Procedures, or pursuant to the Debtors' process for resolving proofs of claim filed in these chapter 11 cases. Accordingly, these 505 Disallowed Reclamation Demands are not included on Exhibit A hereto, which lists the 350 Reclamation Claims that are the subject of this Motion.

30. The Debtors estimate the aggregate maximum liability of the 350 Reclamation Claims to be approximately \$17.5 million, subject to further reduction. As of the date of this Motion, only 15 of the 350 Reclamation Claims remained "disputed" in amount. The aggregate asserted amount of the 15 "disputed" Reclamation Claims is approximately \$18.8 million, but the Debtors' books and records show that the aggregate amount of these "disputed" Reclamation Claims is only approximately \$1.4 million. The aggregate maximum liability for the 335 Reclamation Claims that have been resolved is approximately \$16.1 million. The chart attached hereto as Exhibit A shows (a) the current agreed-upon liability for each of the 335 resolved Reclamation Claims, subject to the Reserved Defenses, and (b) the asserted amount of each of the 15 "disputed" Reclamation Claims and the Debtors' reconciled estimate of such claims.

31. This estimated amount of \$17.5 million, if ultimately determined by this Court to be entitled to priority treatment, may have to be paid from the funds made available to satisfy certain allowed secured, administrative, and priority claims under a modified Confirmed

Plan or any other plan of reorganization of the Debtors. The Debtors submit that because the subject goods, which would not otherwise be reclaimable, were subject to the pre-existing and senior liens of the Prepetition Secured Lenders, the Reclamation Claims should be only afforded treatment as general unsecured claims under a modified Confirmed Plan or any other plan of reorganization of the Debtors.

The Debtors' Prepetition Secured Debt

I. The Prepetition Credit Facility

32. Prior to commencing these chapter 11 cases, the Debtors' secured bank debt arose under that certain Third Amended and Restated Credit Agreement, dated as of June 14, 2005 (as amended, supplemented, or otherwise modified from time to time, the "Prepetition Credit Agreement"). The Prepetition Credit Agreement provided for revolving loans, term loans, swingline loans, and the issuance of letters of credit up to an aggregate principal amount of \$2.825 billion. As of the Petition Date, Delphi was indebted to a syndicate of lenders (the "Prepetition Secured Lenders") in the aggregate amount of \$2,579,783,051.85 (the "Prepetition Credit Facility"). The Prepetition Credit Facility was secured by security interests in substantially all of the material tangible and intangible assets of Delphi and its affiliate Debtors (the "Prepetition Collateral"), including all accounts, chattel paper, deposit accounts, documents, equipment, fixtures, general intangibles, instruments, intellectual property, inventory, investment property, letter of credit rights, all other property not described in this list, all books and records pertaining to the Prepetition Collateral, and all proceeds, supporting obligations and products of any and all of the Prepetition Collateral.⁹

⁹ The Prepetition Collateral did not include certain real property, capital stock of foreign subsidiaries pledged under the Prepetition Credit Facility to the extent that local law requirements were not satisfied, certain manufacturing plants or facilities, and shares of stock or indebtedness of any U.S. subsidiary of Delphi that owns such a manufacturing plant or facility.

J. The DIP Facility

33. After the Debtors commenced these chapter 11 cases, on October 28, 2005, this Court entered an order¹⁰ (the "Original DIP Order") authorizing the Debtors to enter into a \$2 billion postpetition credit facility comprised of a \$1.75 billion revolving line of credit and a \$250 million term loan (the "Original DIP Facility") from a syndicate of lenders (the "Original DIP Lenders"). The Original DIP Facility was secured by (a) a perfected first priority lien on substantially all of the Debtors' otherwise unencumbered assets (subject to certain exclusions), (b) a perfected junior lien on substantially all of the Debtors' previously encumbered assets (subject to certain exclusions), (c) superpriority administrative expense claims under section 364(c)(1) of the Bankruptcy Code in respect of the Debtors' obligations under the Original DIP Facility, and (d) a first priority senior priming lien (the "Priming Lien") under section 364(d)(1) of the Bankruptcy Code on substantially all of the Debtors' property. Pursuant to the Original DIP Order, the result of the Priming Lien was that the Prepetition Secured Lenders' liens were subordinated to those liens securing the Original DIP Lenders' claims under the Original DIP Facility.

K. The Refinanced DIP Facility

34. In late 2006, in light of the then-favorable environment in the capital markets, the Debtors determined that they could replace their existing Prepetition Credit Facility and Original DIP Facility with a new facility combining the two on more favorable terms. On

¹⁰ (See Final Order Under 11 U.S.C. §§ 105, 361, 362, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), And 364(e) And Fed. R. Bankr. P. 2002, 4001 And 9014 (I) Authorizing Debtors To Obtain Postpetition Financing, (II) To Utilize Cash Collateral And (III) Granting Adequate Protection To Prepetition Secured Parties (Docket No. 797).)

January 5, 2007, this Court entered an order¹¹ (the "DIP Refinancing Order") authorizing the Debtors to refinance their secured debt by entering into the current postpetition financing facility (the "DIP Facility") governed by the Revolving Credit, Term Loan, and Guaranty Agreement (the "DIP Credit Agreement") with JPMorgan Chase Bank, N.A. serving as administrative agent. The DIP Facility was essentially a \$4.5 billion replacement financing facility, the proceeds of which the Debtors used to repay the \$2.0 billion Original DIP Facility and the approximately \$2.5 billion outstanding on the Debtors' \$2.825 billion Prepetition Credit Facility. The terms of the DIP Credit Agreement were specifically negotiated to maintain in all material respects the relative priority between the Prepetition Secured Lenders and the Original DIP Lenders (together, the "DIP Lenders"). The DIP Facility replaced the Original DIP Loan with a replacement \$1.75 billion first priority revolving credit facility and a \$250 million first priority term loan.

35. The Prepetition Credit Facility was rolled into the DIP Facility as an approximately \$2.495 billion second priority term loan. Pursuant to paragraph 11(a) of the DIP Refinancing Order, the Debtors were authorized and directed to use the proceeds of borrowings under the DIP Facility to irrevocably repay in full all obligations then due and payable to the Prepetition Secured Lenders under the Prepetition Credit Facility and the Original DIP Order. Upon repayment of all such obligations, all liens, mortgages, and security interests granted to the Prepetition Secured Lenders under the Prepetition Credit Facility and the Original DIP Order were deemed released and of no further force or effect. (See DIP Refinancing Order ¶ 11(a).)

¹¹ (See Order Under 11 U.S.C. §§ 105, 361, 362, 363, 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1), And 364(e) And Fed. R. Bankr. P. 2002, 4001 And 6004(g) (I) Authorizing Debtors To Obtain Postpetition Financing And (II) Authorizing Debtors To Refinance Secured Postpetition Financing And Prepetition Secured Debt (Docket No. 6461).)

36. Like the Original DIP Facility, the DIP Facility is secured by (a) a perfected first priority lien on substantially all of the Debtors' otherwise unencumbered assets (subject to certain exclusions), (b) a perfected junior lien on substantially all of the Debtors' previously encumbered assets (subject to certain exclusions), (c) superpriority administrative expense claims under section 364(c)(1) of the Bankruptcy Code in respect of the Debtors' obligations under the DIP Facility, and (d) a first priority senior priming lien under section 364(d)(1) of the Bankruptcy Code on substantially all of the Debtors' property.

37. The DIP Refinancing Order has been subsequently supplemented by orders entered on November 16, 2007 (Docket No. 10957), April 30, 2008 (Docket No. 13489), May 29, 2008 (Docket No. 13699), December 3, 2008 (Docket No. 14515) (the "Accommodation Order"), February 25, 2009 (Docket No. 16377), April 3, 2009 (Docket No. 16549), April 23, 2009 (Docket No. 16575), May 7, 2009 (Docket Nos. 16609 and 16610), and May 21, 2009 (Docket Nos. 16633 and 16634) (collectively, the "Supplemental DIP Orders"). The Accommodation Order authorized the Debtors to enter into an accommodation agreement (the "Accommodation Agreement"), which was subsequently amended, with the requisite percentage of the DIP Lenders, which, subject to the terms and conditions set forth therein, allows the Debtors to continue using the proceeds of the DIP Facility through June 30, 2009. The relief sought in this Motion is expected to further the Debtors' restructuring efforts in the current macroeconomic climate by, among other things, reducing the amount of administrative claims that the Debtors must satisfy to emerge from Chapter 11.

Applicable Authority

38. As described above, paragraph 2(b)(ii) of the Amended Reclamation Procedures Order authorizes the Debtors to reserve certain defenses to the Reclamation Claims, including the Prior Lien Defense. In accordance with paragraph 2(b)(ii) of the Amended

Reclamation Procedures Order, the Debtors in each Statement of Reclamation reserved the right to assert the Prior Lien Defense. In addition, the Debtors have reserved the Prior Lien Defense and the other Reserved Defenses in each (a) Reclamation Letter Agreement, (b) Statement of Reclamation resolving a reclamation demand by default pursuant to the Reclamation Procedures, and (c) order or stipulation entered by this Court resolving proofs of claim filed in these chapter 11 cases in which a claimant reserved its right to assert priority treatment on account of a reclamation demand.

39. Reclamation rights are generally governed by section 2-702(2) of the Uniform Commercial Code (the "UCC"). Section 2-702(2) of the UCC allows a seller of goods, upon discovering that the buyer has received the goods on credit while insolvent, to reclaim the goods upon a demand made within ten days after the buyer's receipt of the goods. Under section 546(c) of the Bankruptcy Code, a seller of goods to a debtor, in the ordinary course of the seller's business, retains its statutory or common law right to reclaim the goods if it establishes each of the following elements by a preponderance of the evidence:

- (a) that it has a statutory or common law right to reclaim the goods;
- (b) that the goods were sold in the ordinary course of the seller's business;
- (c) that the debtor was insolvent at the time the goods were received; and
- (d) that it made a written demand for reclamation within the statutory time limit after the debtor received the goods.

11 U.S.C. § 546(c); Dairy Mart, 302 B.R. at 133; In re Victory Markets Inc., 212 B.R. 738, 741 (Bankr. N.D.N.Y. 1997).

40. The purpose of section 546(c) of the Bankruptcy Code is to recognize any right to reclamation that a seller may have under non-bankruptcy law. Dairy Mart, 302 B.R. at

132-33. It is black letter law that section 546(c) does not create a new, independent right to reclamation but merely affords the seller an opportunity to avail itself of any reclamation right it may have under non-bankruptcy law. Dana, 367 B.R. at 414; Dairy Mart, 302 B.R. at 133 (citing Galey & Lord Inc. v. Arley Corp. (In re Arlco, Inc.), 239 B.R. 261, 267 (Bankr. S.D.N.Y. 1999); Victory Markets, 212 B.R. at 741; Toshiba Am., Inc. v. Video King of Ill., Inc. (In re Video King of Ill., Inc.), 100 B.R. 1008, 1013 (Bankr. N.D. Ill. 1989)).

41. Once the right to reclamation is established, the court has discretion to substitute an administrative claim or lien in place of the right to reclaim. Dairy Mart, 302 B.R. at 133 (citing Pester Ref. Co. v. Ethyl Corp. (In re Pester Ref. Co.), 964 F.2d 842, 845 (8th Cir. 1992)). If under non-bankruptcy law the value of the reclamation claim is zero, however, section 546(c) does not permit the court to enhance the reclamation claimant's position. Dairy Mart, 302 B.R. at 133. Thus, the reclaiming seller is entitled to receive only what it would have received outside bankruptcy after payment of any superior claim. Id. at 134.

42. Pursuant to section 2-702(3) of the UCC, a seller's right to reclamation is subject to "the rights of a buyer in ordinary course or other good faith purchaser."¹² UCC § 2-702(3). Holders of a prior perfected, floating lien on inventory, such as the Prepetition Secured Lenders, are treated as good faith purchasers with rights superior to those of a reclaiming seller.

¹² As of the Petition Date, the Debtors operated plants and facilities in the following 20 states: Alabama, Arizona, California, Colorado, Georgia, Illinois, Indiana, Kansas, Michigan, Mississippi, Missouri, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, and Wisconsin. Each of these states has adopted section 2-702 of the UCC, with nine of these states further restricting parties' reclamation rights, making them subject to the rights of "other lien creditor[s]." Compare Cal. Com. Code § 2702, Colo. Rev. Stat. § 4-2-702, 810 ILCS 5/2-702, Ind. Code § 26-1-2-702, Kan. Stat. Ann. § 84-2-702, Miss. Code Ann. § 75-2-702, N.J. Stat. Ann. § 12A:2-702, N.Y. U.C.C. Law § 2-702, Okla. Stat. tit. 12A, § 2-702, 13 Pa. Cons. Stat. § 2702, and Wis. Stat. § 402.702 (each adopting section 2-702 as written) with Ala. Code § 7-2-702, Ariz. Rev. Stat. Ann. § 47-2702, Ga. Code Ann. § 11-2-702, Mich. Comp. Laws § 440.2702, Mo. Rev. Stat. § 400.2-702, Ohio Rev. Code Ann. § 1302.76, S.C. Code Ann. § 36-2-702, Tenn. Code Ann. § 47-2-702, and Tex. Bus. & Com. Code Ann. § 2.702 (each revising section 2-702 to include the rights of "other lien creditor[s]").

Dairy Mart, 302 B.R. at 133; Arlco, 239 B.R. at 267-68; In re Advanced Mktg. Servs., Inc., 360 B.R. 421, 426 (Bankr. D. Del. 2007).¹³

43. Moreover, "a reclaiming seller is entitled to a lien or administrative expense claim only to the extent that the value of the specific inventory in which the reclaiming seller asserts an interest exceeds the amount of the floating lien in the debtor's inventory." Dana, 367 B.R. at 419 (quoting Yenkin Majestic Paint Corp. v. Wheeling-Pittsburgh Steel Corp. (In re Pittsburgh-Canfield Corp.), 309 B.R. 277, 287 (B.A.P. 6th Cir. 2004)); Dairy Mart, 302 B.R. at 134; Victory Markets, 212 B.R. at 744. This is because a secured creditor has the option of proceeding against any of its collateral. Marshalling of proceeds is not permissible because of the prejudice that would result to the senior creditor by the imposed delay, added cost, or inconvenience in collecting on its claim when it has a more readily available method to collect the amount owed. Dairy Mart, 302 B.R. at 134-35 (citing Arlco, 239 B.R. at 274-76). Thus, "[w]hen goods subject to a reclamation demand are liquidated and the proceeds used to pay the

¹³ The recent ruling by the United States Court of Appeals for the Sixth Circuit in Phar-Mor, Inc. v. McKesson Corp., 534 F.3d 502 (6th Cir. 2008) is not applicable here. In Phar-Mor, the Sixth Circuit held that because reclaiming creditors have a right under the UCC to reclaim the goods, the bankruptcy court was obligated under section 546(c) to grant the reclamation request or to grant the reclaiming creditor either an administrative expense priority claim or a lien on the proceeds resulting from the use of the goods by the debtor. The Sixth Circuit concluded that the "subject to" caveat in the UCC does not allow a secured creditor's claim to defeat a seller's reclamation right. Phar-Mor, 534 F.3d at 506. First, the Sixth Circuit is not binding on this Court. Second, the Sixth Circuit is Phar-Mor decision abrogates the "subject to" language in section 2-702(3) of the UCC by following a line of cases that has been justifiably criticized by many courts in this district and others. See, e.g., Dana, 367 B.R. at 419-21 (rejecting reclamation claimant's argument that payment in full of prepetition secured debt through postpetition financing rather than sale of claimed goods released liens and that right to reclaim was not affected by secured creditors); Advanced Mktg. Servs., 360 B.R. at 426 (denying reclamation claimant's request for injunctive relief where prepetition secured debt would soon be satisfied by rollover under postpetition financing because subject goods were subject to secured lenders first priority liens). The cases cited by the Sixth Circuit in support of its ruling in Phar-Mor improperly granted either an administrative expense priority without considering the reclamation claims' value in comparison to the secured creditors' interests or a lien in other assets of the bankruptcy estate in which the reclaiming seller had no interest. See, e.g., Galey & Lord Inc. v. Arley Corp. (In re Arlco, Inc.), 239 B.R. 261, 272-73 (Bankr. S.D.N.Y. 1999) ("[G]ranting an administrative claim or lien when the secured creditors have paid their claims out of the goods to be reclaimed 'would afford the reclamation seller something it does not have under the UCC – a priority interest in the buyer's assets other than the goods to be reclaimed.'" (quoting Pester Ref. Co. v. Ethyl Corp. (In re Pester Ref. Co.), 964 F.2d 842, 847 (8th Cir. 1992))).

secured creditor's claim, the reclaiming seller's subordinated right is rendered valueless." Id. at 134 (citing Arlco, 239 B.R. at 273). See also Dana, 367 B.R. at 419 ("if the value of any given reclaiming supplier's goods does not exceed the amount of debt secured by the prior lien, that reclamation claim is valueless"); Advanced Mktg. Servs., 360 B.R. at 427 ("unsecured creditors cannot invoke the equitable doctrine of marshalling" (quoting Pittsburgh-Canfield, 309 B.R. at 291)); Allegiance Healthcare Corp. v. Primary Health Sys., Inc. (In re Primary Health Sys., Inc.), 258 B.R. 111, 117 (Bankr. D. Del. 2001) ("Permitting such a creditor (whose claim outside of bankruptcy is nothing more than a general unsecured claim) to elevate its claim to administrative or secured status in bankruptcy would give it a windfall.").¹⁴

44. Under the Amended Reclamation Procedures Order, the Debtors have reconciled all 855 reclamation demands asserted against them in these chapter 11 cases, resolving 840 of such demands. As noted above, 505 reclamation demands have been resolved in the amount of zero. With respect to the remaining 350 Reclamation Claims that are the subject of this Motion, the Debtors preserved certain Reserved Defenses, including the Prior Lien Defense, under section 546 of the Bankruptcy Code and section 2-702(2) of the UCC.

45. This Court previously stated that "a reclaiming creditor does not have a right of reclamation until it is established that either the secured creditor, with a prior interest in its particular asset, has released the asset or has been paid in full." (See August 17 Transcript 35:17-21.) Therefore, the value of a reclamation claim will be determined by the decision that a secured creditor makes with respect to its lien on the reclaimed goods. See Arlco, 239 B.R. at 272. Courts have consistently held that a reclaiming creditor has an in rem right and that if the

¹⁴ As noted by this Court at the August 17, 2006 hearing in discussing the rights of reclaiming sellers whose rights are subject to those of a secured creditor, "priorities are to be determined narrowly in bankruptcy given the fact that any priority takes money out of the pocket of those who do not have a priority." (Hr'g Tr. 37:17-19, Aug. 17, 2006 (the "August 17 Transcript") (citing Howard Delivery Serv., Inc. v. Zurich Am. Ins. Co., 547 U.S. 651, 667 (2006)).) A copy of an excerpt from the August 17 Transcript is attached as Exhibit B hereto.

secured creditor has been satisfied out of the proceeds from the claimed goods or has released its lien, the value of that in rem right is zero. Dana, 367 B.R. at 419.

46. Courts in this jurisdiction have held that the simultaneous release of a prepetition lenders' lien and the grant of a postpetition lien to postpetition lenders of a debtor's prepetition and postpetition property constitutes an integrated transaction rendering the reclamation claims valueless. See, e.g., Dana, 367 B.R. at 421 (finding that integrated transaction rendered reclamation claims valueless, even when the prepetition secured lenders were paid in full); Dairy Mart, 302 B.R. at 134 (holding that rollover lien pursuant to DIP refinancing order is an integrated transaction). Here, as described above, the DIP Refinancing Order provides for the simultaneous release of the Prepetition Secured Lenders' liens upon full repayment of the obligations to the Prepetition Secured Lenders from the DIP Facility. The DIP Refinancing Order also grants a lien to the DIP Lenders on all prepetition and postpetition property of the Debtors that was unencumbered after the prepetition secured lender's liens were released. (See DIP Refinancing Order ¶¶ 11(a), 6(a).)

47. "[I]f the value of any given reclaiming supplier's goods does not exceed the amount of debt secured by the prior lien, that reclamation claim is valueless." Dana, 367 B.R. at 419. The Debtors' prepetition secured debt under the Prepetition Secured Facility totaled \$2,579,783,051.85. The Debtors' estimated possible liability for all of the Reclamation Claims is approximately \$17.5 million, the maximum possible liability is approximately \$34.9 million, and the largest of the Reclamation Claims asserts a liability of \$5,186,958.58. Accordingly, the Reclamation Claims are valueless. Based on the reasoning of Dairy Mart and Dana, the subject goods related to Reclamation Claims are subject to the prior liens of the Prepetition Secured Lenders. Because the DIP Refinancing Order caused these liens to be

released, thereby satisfying the secured debt in part through the proceeds from the subject goods, the Reclamation Claims are not entitled to administrative priority status. For these reasons, the Reclamation Claims should be classified as general unsecured claims and afforded the treatment of the same under a modified Confirmed Plan or any plan of reorganization of the Debtors.

Notice

48. Notice of this Motion has been provided in accordance with the Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered March 20, 2006 (Docket No. 2883), and the Fourteenth Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered May 1, 2009 (Docket No. 16589). Furthermore, the Debtors have complied with the Supplemental Case Management Order with respect to the filing of this Motion and the need for expedited relief.¹⁵ In light of the nature of the relief requested, the Debtors submit that no other or further notice is necessary.

¹⁵ The Debtors have noticed this Motion for hearing on June 16, 2009. In compliance with the terms of the Supplemental Case Management Order, the Debtors have consulted with counsel to the Creditors' Committee regarding the relief sought in this Motion as well as the timing of its filing. The Creditors' Committee has consented to this Motion's being heard on June 16, 2009. Because this Motion is being filed on fewer than 20 days' notice, parties-in-interest will have until June 12, 2009 to file an objection to this Motion.

WHEREFORE the Debtors respectfully request that the Court enter an order
(a) classifying the Reclamation Claims as general unsecured nonpriority claims for all purposes,
including for purposes of voting and distribution under any plan of reorganization, and (b)
granting the Debtors such other further relief as is just.

Dated: New York, New York
June 5, 2009

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Debtors and Debtors-in-Possession

EXHIBIT A

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
27	Alcoa Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Unresolved	10/10/2005	n/a	\$ 2,760,429.64	\$ 492,799.17
32	PBR Columbia L.L.C.	PBR COLUMBIA LLC	Unresolved	10/10/2005	n/a	\$ 1,043,145.33	\$ 1,780.09
75	PBR Knoxville LLC	SPECIAL SITUATIONS INVESTING GROUP INC	Unresolved	10/10/2005	n/a	\$ 3,443,149.25	\$ -
109	AFL Automotive L.P.	AFL AUTOMOTIVE LP TEXAS LIMITED PARTNERSHIP/SPCP GROUP LLC	Unresolved	10/11/2005	n/a	\$ 373,129.95	\$ 51,983.34
110	AVON AUTOMOTIVE, INC.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF CADILLAC RUBBER & PLASTICS INC	Unresolved	10/11/2005	n/a	\$ 715,920.17	\$ 96,919.23
317	Citation Corporation	JP MORGAN CHASE BANK	Unresolved	10/12/2005	n/a	\$ 543,312.80	\$ 72,015.84
337	Yazaki North America, Inc.	YAZAKI NORTH AMERICA INC	Unresolved	10/11/2005	n/a	\$ 555,103.78	\$ 11,357.23
372	Ideal Tool Co. Inc.	SOL - IDEAL TOOL CO INC	Unresolved	10/14/2005	n/a	\$ 630,913.33	\$ 118,258.54
383	Coherent, Inc.	LONGACRE MASTER FUND LTD	Unresolved	10/13/2005	n/a	\$ 202,500.00	\$ 202,500.00
529	Siemens VDO Automotive Corporation	GOLDMAN SACHS CREDIT PARTNERS LP ASSIGNEE OF SIEMENS VDO AUTOMOTIVE CORPORATION AND SIEMENS VDO AUTOMOTIVE INC	Unresolved	10/17/2005	n/a	\$ 5,186,958.58	\$ 217,346.39
713	Phillips & Temro Industries Inc.	PHILLIPS & TEMRO INDUSTRIES LTD	Unresolved	10/21/2005	n/a	\$ 104,732.46	\$ -
750	Foreman Tool & Mold Corporation	SOL - FOREMAN TOOL & MOLD CORP/ STONEHILL INSTITUTIONAL PARTNERS LP	Unresolved	10/17/2005	n/a	\$ 131,194.96	\$ 27,713.06
763	Textron Fastening Systems	GOLDMAN SACHS CREDIT PARTNERS LP	Unresolved	10/23/2005	n/a	\$ 2,803,310.85	\$ 65,958.81
842	Trans Tron, Ltd., Inc.	BEAR STEARNS INVESTMENT PRODUCTS INC	Unresolved	10/11/2005	n/a	\$ 301,669.56	\$ 9,609.15
847	Textron Fastening Systems	GOLDMAN SACHS CREDIT PARTNERS LP	Unresolved	10/26/2005	n/a	\$ 6,951.33	\$ 40.65
1	Small Parts	SMALL PARTS INC	Resolved	10/04/2005	\$ 32,169.54	n/a	n/a
5	S&Z Tool and Die Co., INC	LIQUIDITY SOLUTIONS INC	Resolved	10/08/2005	\$ 111,882.90	n/a	n/a
6	SyZ Rolmex, S. de R.L. de C.V.	LIQUIDITY SOLUTIONS INC	Resolved	10/08/2005	\$ 4,000.00	n/a	n/a
7	Trostel, Ltd	CONTRARIAN FUNDS LLC AS ASSIGNEE OF TROSTEL LTD	Resolved	10/09/2005	\$ 16,194.53	n/a	n/a
8	Steel Technologies, Inc	STEEL TECHNOLOGIES INC	Resolved	10/08/2005	\$ 52,310.89	n/a	n/a
10	Hitachi Chemical (Singapore) Pte. Ltd.	HITACHI CHEMICAL SINGAPORE PTE LTD FKA HITACHI CHEMICAL ASIA PACIFIC PTE LTD	Resolved	10/10/2005	\$ 219,986.79	n/a	n/a
11	ARC Automotive, Inc	ARC AUTOMOTIVE INC	Resolved	10/10/2005	\$ 218,571.21	n/a	n/a
12	U.S. Silica Company	US SILICA COMPANY	Resolved	10/10/2005	\$ 6,000.00	n/a	n/a
13	Material Sciences Corporation	MATERIAL SCIENCES CORPORATION	Resolved	10/10/2005	\$ 39,830.12	n/a	n/a
16	Curtis Screw Company, LLC	MADISON NICHE OPPORTUNITIES LLC	Resolved	10/08/2005	\$ 52,906.09	n/a	n/a
18	Unifrax Corporation	UNIFRAX CORPORATION	Resolved	10/10/2005	\$ 25,878.10	n/a	n/a
21	Novelis Corporation	CONTRARIAN FUNDS LLC	Resolved	10/10/2005	\$ 33,090.25	n/a	n/a
22	Wellman, Inc.	WELLMAN INC	Resolved	10/10/2005	\$ 28,575.50	n/a	n/a
24	GKN Sinter Metals	DEUTSCHE BANK SECURITIES INC	Resolved	10/10/2005	\$ 32,312.82	n/a	n/a
25	Flow Dry Technology Ltd.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF FLOW DRY TECHNOLOGY LTD	Resolved	10/10/2005	\$ 42,727.58	n/a	n/a
26	PTI Engineered Plastics, Inc.	ARGO PARTNERS	Resolved	10/10/2005	\$ 620.00	n/a	n/a
35	HK Metalcraft Mfg Corp	HK METAL CRAFT MFG CORP	Resolved	10/10/2005	\$ 1,533.05	n/a	n/a
38	NEC Electronics America, Inc.	JPMORGAN CHASE BANK NA	Resolved	10/08/2005	\$ 3,424,138.98	n/a	n/a
40	Judd Wire, Inc.	JP MORGAN CHASE BANK	Resolved	10/09/2005	\$ 232,871.66	n/a	n/a
41	Hammond Group, Inc.	LIQUIDITY SOLUTIONS INC AS ASSIGNEE OF HAMMOND GROUP INC	Resolved	10/10/2005	\$ 15,397.30	n/a	n/a
45	SKF USA, INC	SKF USA INC	Resolved	10/10/2005	\$ 85,147.45	n/a	n/a
47	Victory Packaging	VICTORY PACKAGING LP	Resolved	10/08/2005	\$ 658,509.45	n/a	n/a
49	HK Metal Craft Manufacturing Corp.	HK METAL CRAFT MANUFACTURING CORP	Resolved	10/10/2005	\$ 572.00	n/a	n/a
50	HK Metalcraft Manufacturing Corporation-Packard	HK METAL CRAFT MANUFACTURING CORP	Resolved	10/10/2005	\$ 3,850.28	n/a	n/a
51	Thaler Machine Company	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 31,412.25	n/a	n/a
52	Select Industries Corp.	SELECT INDUSTRIES CORPORATION FKA SELECT TOOL & DIE CORP	Resolved	10/10/2005	\$ 20,736.60	n/a	n/a
53	INA USA Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF INA USA CORPORATION	Resolved	10/10/2005	\$ 233,212.96	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
54	Robin Mexicana, S. de R.L. de C.V.	ROBIN MEXICANA S DE RL DE CV	Resolved	10/10/2005	\$ 47,982.69	n/a	n/a
55	Robin Industries, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 81,341.20	n/a	n/a
56	Robin Industries	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 58,220.01	n/a	n/a
57	Valeo Switches & Detection Systems, Inc	VALEO SWITCHES AND DETECTION SYSTEMS INC	Resolved	10/10/2005	\$ 1,653.86	n/a	n/a
61	Eagle Picher Automotive	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 20,001.80	n/a	n/a
62	Integrated Logistics Solutions	INTEGRATED LOGISTICS SOLUTIONS	Resolved	10/10/2005	\$ 1,057.80	n/a	n/a
68	FAG Automotive	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SCHAEFFLER CANADA INC	Resolved	10/10/2005	\$ 80,774.09	n/a	n/a
69	Angell-Demmel North America	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 13,807.69	n/a	n/a
70	Teleflex, Incorporated	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/10/2005	\$ 57,003.23	n/a	n/a
71	Carolina Forge Co. LLC	JPMORGAN CHASE BANK NA	Resolved	10/11/2005	\$ 197,519.25	n/a	n/a
72	Meadville Forging Co	JPMORGAN CHASE BANK NA	Resolved	10/10/2005	\$ 213,681.48	n/a	n/a
73	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 5,830.84	n/a	n/a
76	Ken-Mac Metals	HAIN CAPITAL INVESTORS LLC	Resolved	10/10/2005	\$ 55,022.63	n/a	n/a
82	American & Efird	AMROC INVESTMENTS LLC	Resolved	10/10/2005	\$ 8,323.61	n/a	n/a
83	Prestolite Wire Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF PRESTOLITE WIRE CORPORATION	Resolved	10/10/2005	\$ 16,141.07	n/a	n/a
90	Cascade Die Casting Group, Inc	CASCADE DIE CASTING GROUP	Resolved	10/10/2005	\$ 11,105.86	n/a	n/a
93	ChicagoRivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/11/2005	\$ 2,133.34	n/a	n/a
95	Parkview Metal Products Inc	PARKVIEW METAL PRODUCTS	Resolved	10/10/2005	\$ 17,050.64	n/a	n/a
96	Strattec Security Corp	CONTRARIAN FUNDS LLC AS ASSIGNEE OF STRATTEC SECURITY CORP	Resolved	10/10/2005	\$ 43,124.50	n/a	n/a
97	TRANS-MATIC MFG Co Inc	REDROCK CAPITAL PARTNERS LLC	Resolved	10/11/2005	\$ 6,207.62	n/a	n/a
98	Quality Synthetic Rubber Inc.	QUALITY SYNTHETIC RUBBER INC	Resolved	10/11/2005	\$ 187,197.76	n/a	n/a
99	Rohm Electronics USA LLC	ROHM ELECTRONICS USA LLC	Resolved	10/10/2005	\$ 107,101.70	n/a	n/a
100	3M Company	3M COMPANY	Resolved	10/11/2005	\$ 34,337.94	n/a	n/a
102	CTS Corp	CTS CORPORATION	Resolved	10/11/2005	\$ 28,261.53	n/a	n/a
104	Pridgeon & Clay, Inc.	PRIDGEON & CLAY INC	Resolved	10/10/2005	\$ 54,023.95	n/a	n/a
105	Park-Ohio Products, Inc.	PARK OHIO PRODUCTS INC	Resolved	10/11/2005	\$ 45,060.80	n/a	n/a
108	Engineered Plastic Components	AFL AUTOMOTIVE LP TEXAS LIMITED PARTNERSHIP/AFL AUTOMOTIVE LIMITED PARTNERSHIP MICHIGAN LIMITED PARTNERSHIP/SPCP GROUP LLC	Resolved	10/12/2005	\$ 234,212.10	n/a	n/a
111	Magnesium Aluminum Corporation	AMROC INVESTMENTS LLC	Resolved	10/11/2005	\$ 36,684.88	n/a	n/a
112	Fawn Industries	FAWN PLASTICS CO INC	Resolved	10/11/2005	\$ 26,190.18	n/a	n/a
120	OSRAM Opto Semiconductors Inc	OSRAM OPTO SEMICONDUCTORS INC	Resolved	10/11/2005	\$ 88,989.40	n/a	n/a
122	Brazeway, Inc	JPMORGAN CHASE BANK NA AS ASSIGNEE OF BRAZEWAY INC	Resolved	10/11/2005	\$ 101,905.91	n/a	n/a
123	J&F Steel LLC/Ryerson Tull	JOSEPH T RYERSON & SON INC	Resolved	10/10/2005	\$ 4,903.55	n/a	n/a
124	Valeo Wiper Systems	VALEO ELECTRICAL SYSTEMS INC WIPERS DIVISION	Resolved	10/12/2005	\$ 8,518.50	n/a	n/a
125	Valeo	VALEO CLIMATE CONTROL CORPORATION	Resolved	10/10/2005	\$ 156,725.41	n/a	n/a
126	Mubea	MUBEA INC	Resolved	10/11/2005	\$ 132,206.98	n/a	n/a
128	MTD Technologies	CONTRARIAN FUNDS LLC AS ASSIGNEE OF MTD TECHNOLOGIES INC	Resolved	10/12/2005	\$ 16,294.70	n/a	n/a
130	Republic Engineered Products, Inc.	AMROC INVESTMENTS LLC	Resolved	10/10/2005	\$ 305,961.91	n/a	n/a
131	Sony Electronics Inc.	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 12,250.00	n/a	n/a
135	Robin Industries, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 4,266.38	n/a	n/a
136	Robin Industries, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 20,668.09	n/a	n/a
137	Robin Industries, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 27,814.26	n/a	n/a

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Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
146	Affinia Canada Corp.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 10,000.00	n/a	n/a
149	Sharp Electronics Corporation	LONGACRE MASTER FUND LTD AS ASSIGNEE/TRANSFEE OF SHARP ELECTRONICS CORP	Resolved	10/11/2005	\$ 40,000.00	n/a	n/a
153	Molex Connector Corporation	TPG CREDIT STRATEGIES FUND LP	Resolved	10/11/2005	\$ 325,797.70	n/a	n/a
157	Cardone Industries, Inc	CARDONE INDUSTRIES INC	Resolved	10/12/2005	\$ 9,760.00	n/a	n/a
158	Muskegon Casting Corp.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 11,566.85	n/a	n/a
163	Eaton Corporation	LIQUIDITY SOLUTIONS INC AS ASSIGNEE OF EATON CORPORATION	Resolved	10/10/2005	\$ 107,257.28	n/a	n/a
165	Precision Stamping	SPCP GROUP LLC AS ASSIGNEE OF PRECISION DIE & STAMPING INC	Resolved	10/12/2005	\$ 16,615.31	n/a	n/a
166	Johnson Battery Company, Inc.	JOHNSON BATTERY COMPANY INC	Resolved	10/12/2005	\$ 13,494.00	n/a	n/a
176	Lunt Manufacturing Company	STONEHILL INSTITUTIONAL PARTNERS LP	Resolved	10/11/2005	\$ 10,000.00	n/a	n/a
178	Spring Engineering & Manufacturing Corporation	MADISON INVESTMENT TRUST SERIES 38	Resolved	10/11/2005	\$ 5,293.69	n/a	n/a
184	American Coil Spring Company, Inc.	AMERICAN COIL SPRING COMPANY	Resolved	10/12/2005	\$ 6,798.05	n/a	n/a
185	Hilite International, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 2,422.72	n/a	n/a
186	Milliken & Company	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 202,412.11	n/a	n/a
188	Trelleborg Automotive	CONTRARIAN FUNDS LLC AS ASSIGNEE OF TRELLEBORG YSH SA DE CV/CONTRARIAN FUNDS LLC AS ASSIGNEE OF TRELLEBORG YSH INC	Resolved	10/10/2005	\$ 15,865.76	n/a	n/a
189	Otto Bock Polyurethane Technologies, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 130,000.00	n/a	n/a
191	ATF, Incorporated	ACCURATE THREADED FASTENERS INC ATF INC	Resolved	10/11/2005	\$ 71,376.60	n/a	n/a
195	Engineered Sintered Components - Hain Capital Holdings, LLC	HAIN CAPITAL INVESTORS LLC	Resolved	10/12/2005	\$ 7,443.36	n/a	n/a
200	Gobar Systems	GOBAR SYSTEMS INC	Resolved	10/12/2005	\$ 2,848.88	n/a	n/a
201	Fulton Industries, Inc.	FULTON INDUSTRIES INC	Resolved	10/12/2005	\$ 912.23	n/a	n/a
203	CTS of Canada	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 3,120.45	n/a	n/a
205	H & L Tool Company, Inc.	H & L TOOL COMPANY INC	Resolved	10/09/2005	\$ 7,344.65	n/a	n/a
206	Wamco, Inc.	AMROC INVESTMENTS LLC	Resolved	10/11/2005	\$ 63,001.69	n/a	n/a
207	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/12/2005	\$ 1,553.52	n/a	n/a
215	Chicago Rivet & Machine Company	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 1,735.38	n/a	n/a
217	Iriso USA, Inc.	AMROC INVESTMENTS LLC	Resolved	10/12/2005	\$ 58,853.42	n/a	n/a
218	GE Thermometrics, Inc.	GE INFRASTRUCTURE SENSING	Resolved	10/13/2005	\$ 42,903.31	n/a	n/a
219	Boyd Corporation	BOYD CORPORATION	Resolved	10/12/2005	\$ 16,738.79	n/a	n/a
222	Elgin Die Mold Company	LIQUIDITY SOLUTIONS INC	Resolved	10/10/2005	\$ 2,668.00	n/a	n/a
228	Illinois Tool Works	Multiple Owners	Resolved	10/12/2005	\$ 244,697.11	n/a	n/a
229	EFTEC North America	EFTEC NORTH AMERICA	Resolved	10/12/2005	\$ 14,711.99	n/a	n/a
230	AMI Industries, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 184.23	n/a	n/a
232	Metal Cladding, Inc.	METAL CLADDING INC	Resolved	10/12/2005	\$ 14,090.99	n/a	n/a
235	Assembly System Innovators	CONTRARIAN FUNDS LLC	Resolved	10/10/2005	\$ 325.80	n/a	n/a
239	Lexington Connector Seals	LEXINGTON RUBBER GROUP INC	Resolved	10/12/2005	\$ 12,451.81	n/a	n/a
241	GE Silicones	GE SILICONES	Resolved	10/13/2005	\$ 37,338.82	n/a	n/a
242	Teleflex Incorporated	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 4,315.42	n/a	n/a
244	Cherry GmbH	CHERRY GMBH	Resolved	10/11/2005	\$ 161,563.08	n/a	n/a
245	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 11,201.77	n/a	n/a
247	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 822.47	n/a	n/a
249	Lexington Connector Seals	LEXINGTON RUBBER GROUP INC	Resolved	10/12/2005	\$ 28,390.99	n/a	n/a
252	Reliable Casting Corporation	RELIABLE CASTING CORP SIDNEY DIV	Resolved	10/12/2005	\$ 37,324.15	n/a	n/a
253	Master Molded Products Corporation	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 21,774.05	n/a	n/a
254	CTS Automotive Products	CTS CORPORATION	Resolved	10/11/2005	\$ 77,431.40	n/a	n/a

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255	SEPR Ceramic Beads and Powders	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 35,310.00	n/a	n/a
258	N.D.K. America, Inc.	LATIGO MASTER FUND LTD	Resolved	10/12/2005	\$ 145,267.57	n/a	n/a
259	Foster Electric (U.S.A.), Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 433.60	n/a	n/a
262	VJ TECHNOLOGIES, INC.	LONGACRE MASTER FUND LTD	Resolved	10/12/2005	\$ 60,000.00	n/a	n/a
263	Carlton-Bates Company	CARLTON BATES COMPANY	Resolved	10/11/2005	\$ 66,627.99	n/a	n/a
266	Integrated Cable Systems, Inc.	INTEGRATED CABLE SYSTEMS INC	Resolved	10/12/2005	\$ 28,105.36	n/a	n/a
267	Arrow Sheet Metal Co.	ARROW SHEET METAL PRODUCTS CO	Resolved	10/12/2005	\$ 6,367.31	n/a	n/a
269	Markel Corporation	MARKEL CORP	Resolved	10/10/2005	\$ 8,585.01	n/a	n/a
271	Hollingsworth & Vose Company	HOLLINGSWORTH & VOSE CO	Resolved	10/11/2005	\$ 5,984.96	n/a	n/a
273	Tokico (USA) Incorporated	DEUTSCHE BANK SECURITIES INC	Resolved	10/11/2005	\$ 466.56	n/a	n/a
275	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 495.50	n/a	n/a
277	Graber-Rogg, Inc.	GRABER ROGG INC	Resolved	10/11/2005	\$ 1,376.07	n/a	n/a
281	Graber Rogg, Inc.	GRABER ROGG INC	Resolved	10/12/2005	\$ 26,352.82	n/a	n/a
282	Casco Products Corporation	CASCO PRODUCTS CORPORATION	Resolved	10/05/2005	\$ 5,760.48	n/a	n/a
289	Automotive Electronic Controls	BLUE ANGEL CLAIMS LLC	Resolved	10/11/2005	\$ 3,268.34	n/a	n/a
291	Motorola	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 39,060.00	n/a	n/a
292	Stueken, LLC	HAIR CAPITAL HOLDINGS LLC	Resolved	10/11/2005	\$ 12,760.50	n/a	n/a
296	Total Component Solutions	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 900.36	n/a	n/a
297	United Plastics Group, Inc.	UNITED PLASTICS GROUP/UPC DE MEXICO S DE RL DE CV	Resolved	10/13/2005	\$ 12,681.59	n/a	n/a
305	Millenium Industries Corporation Cass City	CONTRARIAN FUNDS LLC	Resolved	10/13/2005	\$ 1,942.04	n/a	n/a
306	Emhart Teknologies	EMHART TEKNOLOGIES LLC	Resolved	10/13/2005	\$ 27,128.77	n/a	n/a
307	M & S Manufacturing	M & S MANUFACTURING COMPANY	Resolved	10/13/2005	\$ 13,620.06	n/a	n/a
308	Cataler North America Corporation	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/13/2005	\$ 18,298.73	n/a	n/a
309	Ralco Industries	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 26,986.10	n/a	n/a
313	International Rectifier	INTERNATIONAL RECTIFIER CORPORATION	Resolved	10/11/2005	\$ 25,243.50	n/a	n/a
315	Stanley Electric Sales of America, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 145,690.87	n/a	n/a
319	Panasonic Automotive Systems Company of America	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/13/2005	\$ 78,475.89	n/a	n/a
320	International Resistive Co., Inc.	INTERNATIONAL RESISTIVE COMPANY WIRE & FILM TECHNOLOGIES DIVISION/INTERNATIONAL RESISTIVE COMPANY ADVANCED FILM DIVISION/TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/13/2005	\$ 1,716.07	n/a	n/a
322	Murata Electronic North America	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/12/2005	\$ 115,579.28	n/a	n/a
323	Catalytic Solutions	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 9,345.36	n/a	n/a
328	INA USA Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF INA USA CORPORATION	Resolved	10/10/2005	\$ 32,662.29	n/a	n/a
331	Kamax S.A.U.	KAMAX SAU	Resolved	10/13/2005	\$ 1,803.58	n/a	n/a
333	Rohm and Haas Company	CABLE TECHNOLOGIESINC	Resolved	10/13/2005	\$ 18,966.38	n/a	n/a
334	Rohm and Haas Company	ROHM AND HAAS CO	Resolved	10/10/2005	\$ 25,117.91	n/a	n/a
335	TT Electronics	TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/14/2005	\$ 1,320.21	n/a	n/a
338	Graber-Rogg, Inc.	GRABER ROGG INC	Resolved	10/11/2005	\$ 2,547.30	n/a	n/a
341	Rotor Clip Company, Inc.	ROTOR CLIP COMPANY INC	Resolved	10/13/2005	\$ 14,497.86	n/a	n/a
344	Olson International Ltd.	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 27,979.91	n/a	n/a
345	International Resistive Company, Advanced Film Division	INTERNATIONAL RESISTIVE COMPANY WIRE & FILM TECHNOLOGIES DIVISION/TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/13/2005	\$ 77,693.93	n/a	n/a
349	Unisource Worldwide, Inc.	UNISOURCE WORLDWIDE INC	Resolved	10/12/2005	\$ 43.84	n/a	n/a
352	Taurus International Corporation	SOL - TAURUS INTERNATIONAL CORP	Resolved	10/13/2005	\$ 38,818.19	n/a	n/a
353	RBC Bearings	RBC BEARINGS	Resolved	10/13/2005	\$ 21,375.00	n/a	n/a

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354	Wright Plastic Products Co., LLC	CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 20,691.18	n/a	n/a
356	Tech Tool & Mold, Inc.	TECH TOOL & MOLD INC EFT	Resolved	10/13/2005	\$ 45,859.51	n/a	n/a
359	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 1,827.00	n/a	n/a
360	Multibase Inc.	MULTIBASE INC	Resolved	10/14/2005	\$ 4,345.60	n/a	n/a
361	CYRO INDUSTRIES	SPCP GROUP LLC	Resolved	10/14/2005	\$ 80,704.28	n/a	n/a
365	Dow Corning Corporation	DOW CORNING CORP	Resolved	10/14/2005	\$ 12,809.61	n/a	n/a
373	American Electronic Components Inc.	SIEMENS VDO AUTOMOTIVE CORPORATION ASSIGNEE OF AMERICAN ELECTRONIC COMPONENTS INC	Resolved	10/14/2005	\$ 11,006.25	n/a	n/a
374	ST MICROELECTRONICS, INC.	LONGACRE MASTER FUND LTD	Resolved	10/12/2005	\$ 153,204.95	n/a	n/a
375	Batesville Tool & Die, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 20,647.07	n/a	n/a
378	J.O. Galloup Co.	MADISON NICHE OPPORTUNITIES LLC	Resolved	10/11/2005	\$ 1,000.00	n/a	n/a
379	Kendall Electric Inc	MIDTOWN CLAIMS LLC	Resolved	10/10/2005	\$ 97,429.07	n/a	n/a
381	Silicon Laboratories, Inc.	SILICON LABORATORIES INC	Resolved	10/13/2005	\$ 9,726.81	n/a	n/a
384	ETCO Automotive Products	CONTRARIAN FUNDS LLC AS ASSIGNEE OF ETCO	Resolved	10/13/2005	\$ 1,072.80	n/a	n/a
386	Olson International, LTD.	AMROC INVESTMENTS LLC	Resolved	10/12/2005	\$ 32,874.85	n/a	n/a
391	Eaton Corp	EATON AEROQUIP DE MEXICO SA DE CV	Resolved	10/10/2005	\$ 5,813.32	n/a	n/a
393	Fujikura American, Inc.	FUJIKURA AMERICA INC	Resolved	10/14/2005	\$ 15,482.28	n/a	n/a
394	Century Mold & Tool	CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 75,000.00	n/a	n/a
396	American Molder Products	AMERICAN MOLDED PRODUCTS	Resolved	10/13/2005	\$ 498.74	n/a	n/a
400	NGK Automotive Ceramics USA, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 425,192.03	n/a	n/a
401	Linear Technology Corporation	LINEAR TECHNOLOGY CORPORATION	Resolved	10/13/2005	\$ 116,070.80	n/a	n/a
402	Tadiran Batteries	ARGO PARTNERS	Resolved	10/13/2005	\$ 11,524.40	n/a	n/a
407	Scientific Tube, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/14/2005	\$ 31,000.00	n/a	n/a
415	KARL KUEFNER, KG	HAIN CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 16,927.66	n/a	n/a
417	Stoneridge, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF STONERIDGE INC FOR ITSELF AND ET AL	Resolved	10/14/2005	\$ 12,103.66	n/a	n/a
418	Forest City Technologies, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 9,009.31	n/a	n/a
423	Armada Rubber Manufacturing Co.	ASM CAPITAL LP	Resolved	10/08/2005	\$ 1,210.00	n/a	n/a
424	Hosiden American Corporation	FAIR HARBOR CAPITAL LLC	Resolved	10/14/2005	\$ 1,423.64	n/a	n/a
425	Marian Inc.	MARIAN INC FKA MARIAN RUBBER PRODUCTS	Resolved	10/13/2005	\$ 25,605.91	n/a	n/a
426	Acushnet Rubber Co., Inc	ACUSHNET RUBBER COMPANY INC DBA PRECIX	Resolved	10/14/2005	\$ 14,588.49	n/a	n/a
427	Eikenberry & Associates, Inc	EIKENBERRY & ASSOCIATES INC	Resolved	10/17/2005	\$ 1,530.60	n/a	n/a
428	Sinclair & Rush, Inc	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 3,491.22	n/a	n/a
429	Americhem, Inc.	AMERICHEM INC	Resolved	10/10/2005	\$ 6,797.43	n/a	n/a
430	AVX Corporation	AVX CORP	Resolved	10/13/2005	\$ 11,894.48	n/a	n/a
434	Nichicon America Corp	SPCP GROUP LLC	Resolved	10/14/2005	\$ 5,052.44	n/a	n/a
437	Sagami Amercia, Ltd.	SAGAMI AMERICA LTD	Resolved	10/14/2005	\$ 22,443.37	n/a	n/a
440	Tessier Machine Co.	TESSIER MACHINE CO	Resolved	10/13/2005	\$ 14,880.00	n/a	n/a
441	TDK Corporation	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/13/2005	\$ 172,706.22	n/a	n/a
442	Mabuchi Motor America Corp	MABUCHI MOTOR AMERICA CORP	Resolved	10/14/2005	\$ 875.54	n/a	n/a
446	Chicago Rivet	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 871.08	n/a	n/a
450	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 60,936.01	n/a	n/a
453	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 82,085.30	n/a	n/a
454	United Chemi-Con, Inc.	UNITED CHEMI CON INC	Resolved	10/10/2005	\$ 22,311.50	n/a	n/a
455	Sensus Precision Die Casting, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/17/2005	\$ 101,745.58	n/a	n/a
464	Nu Horizons Electronics Corp.	NU HORIZONS ELECTRONICS CORP	Resolved	10/11/2005	\$ 30,455.00	n/a	n/a
465	Penn Aluminum International, Inc.	PENN ALUMINUM INTERNATIONAL INC	Resolved	10/14/2005	\$ 22,680.99	n/a	n/a
466	Jideco of Bardstown, Inc.	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 6,636.00	n/a	n/a
469	Associated Spring, Barnes Group Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 37,650.77	n/a	n/a
470	Delta Products Corporation	DELTA PRODUCTS CORPORATION	Resolved	10/14/2005	\$ 12,986.67	n/a	n/a
472	Export Corporation	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/17/2005	\$ 11,691.36	n/a	n/a
474	Whirlaway Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF WHIRLAWAY CORPORATION	Resolved	10/17/2005	\$ 26,238.62	n/a	n/a
476	Eagle Picher Automotive - Wolverine Gasket Division	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 7,994.48	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
483	Capsonic Group LLC	REDROCK CAPITAL PARTNERS LLC	Resolved	10/12/2005	\$ 4,337.21	n/a	n/a
487	Hewitt Tool & Die Inc.	HEWITT TOOL & DIE INC	Resolved	10/17/2005	\$ 7,828.35	n/a	n/a
491	St. Clair Plastics Co.	CONSOLIDATED INDUSTRIAL CORP	Resolved	10/18/2005	\$ 3,795.99	n/a	n/a
492	KOSTAL Mexicana, S.A. de C.V.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/14/2005	\$ 11,188.73	n/a	n/a
497	RF Monolithics	ASM CAPITAL II LP	Resolved	10/14/2005	\$ 160,435.27	n/a	n/a
498	Breen Color Concentrates, Inc.	BREEN COLOR CONCENTRATES INC	Resolved	10/14/2005	\$ 5,107.39	n/a	n/a
501	Feintool of Cincinnati, Inc.	AMROC INVESTMENTS LLC AS ASSIGNEE OF FEINTOOL CINCINNATI INC/AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 87,992.63	n/a	n/a
503	Kostal of America, Inc	KOSTAL OF AMERICA INC/SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/14/2005	\$ 2,094.80	n/a	n/a
505	Fittings Products Co. LLC d/b/a Lake Erie Products-Livonia	SIERRA LIQUIDITY FUND LLC	Resolved	10/14/2005	\$ 4,797.32	n/a	n/a
506	LAKE ERIE PRODUCTS INC	LAKE ERIE PRODUCTS INC	Resolved	10/14/2005	\$ 14,082.57	n/a	n/a
514	Electro Dynamics Crystal Corporation	ELECTRO DYNAMICS CRYSTAL CORPORATION	Resolved	10/18/2005	\$ 2,960.00	n/a	n/a
516	Carlisle Engineered Products, Inc.	CARLISLE ENGINEERED PRODUCTS INC	Resolved	10/17/2005	\$ 168,880.61	n/a	n/a
521	Olin Corp.	BANK OF AMERICA N A	Resolved	10/10/2005	\$ 19,461.00	n/a	n/a
522	Kickhafer Manufacturing Company	KICKHAEFER MANUFACTURING CO KMC	Resolved	10/13/2005	\$ 37,150.59	n/a	n/a
526	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 903.60	n/a	n/a
528	American Aikoku Alpha, Inc.	AMERICAN AIKOKU ALPHA INC	Resolved	10/17/2005	\$ 5,823.94	n/a	n/a
530	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 4,507.28	n/a	n/a
531	Werner Co.	WERNER CO	Resolved	10/17/2005	\$ 952.91	n/a	n/a
533	CTS Corporation	CTS CORPORATION	Resolved	10/17/2005	\$ 2,258.44	n/a	n/a
536	Continental/Midland LLC	CONTINENTAL MIDLAND LLC	Resolved	10/18/2005	\$ 1,386.73	n/a	n/a
544	OMG Americas, Inc.	OMG AMERICAS INC	Resolved	10/18/2005	\$ 6,000.00	n/a	n/a
546	Pioneer N.A., Inc.	WHITEBOX HEDGED HIGH YIELD PARTNERS LP	Resolved	10/17/2005	\$ 40,059.72	n/a	n/a
552	Henkel Loctite	HENKEL CORPORATION HENKEL LOCTITE	Resolved	10/11/2005	\$ 177.36	n/a	n/a
553	Sherwin-Williams Company	SHERWIN WILLIAMS COMPANY	Resolved	10/13/2005	\$ 7,325.94	n/a	n/a
555	Dow Corning Corporation	DOW CORNING CORP	Resolved	10/17/2005	\$ 14,446.67	n/a	n/a
557	Raetech Corporation	RAETECH CORPORATION	Resolved	10/18/2005	\$ 4,500.00	n/a	n/a
577	Commodity Management Services LTD.	COMMODITY MGMT SVCS GBS PRINTED PRODS & SYS	Resolved	10/17/2005	\$ 511.95	n/a	n/a
578	Capsonic Automotive, Inc.	REDROCK CAPITAL PARTNERS LLC	Resolved	10/12/2005	\$ 2,714.88	n/a	n/a
585	EIS Inc.	EIS INC	Resolved	10/18/2005	\$ 570.00	n/a	n/a
586	Kurz-Kasch Inc.	LONGACRE MASTER FUND LTD	Resolved	10/18/2005	\$ 8,638.40	n/a	n/a
591	Pax Machine Works, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF PAX MACHINE WORKS INC	Resolved	10/18/2005	\$ 865.58	n/a	n/a
592	Hitchiner Manufacturing Co., Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF HITCHINER MANUFACTURING CO INC	Resolved	10/17/2005	\$ 8,179.67	n/a	n/a
594	Parker- Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 8,163.60	n/a	n/a
596	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 513.10	n/a	n/a
598	THE GLEASON WORKS	HAIR CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 27,955.00	n/a	n/a
605	FEDERAL SCREW WORKS	FEDERAL SCREW WORKS	Resolved	10/18/2005	\$ 4,013.35	n/a	n/a
606	Sanders Lead Co., Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 79,676.69	n/a	n/a
608	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 2,758.89	n/a	n/a
609	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 386.01	n/a	n/a
611	UNISOURCE WORLDWIDE INC	UNISOURCE WORLDWIDE INC	Resolved	10/18/2005	\$ 5,500.00	n/a	n/a
615	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/11/2005	\$ 12,642.17	n/a	n/a
617	Alegre, Inc.	ALEGRE INC	Resolved	10/18/2005	\$ 20,154.39	n/a	n/a
620	Nisshinbo Automotive Corporation	REDROCK CAPITAL PARTNERS LLC	Resolved	10/18/2005	\$ 27,446.05	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
626	Micro Motion, Inc.	MICRO MOTION INC	Resolved	10/18/2005	\$ 5,895.03	n/a	n/a
628	Tessy Plastics Corporation	HAIR CAPITAL HOLDINGS LLC	Resolved	10/18/2005	\$ 9,176.58	n/a	n/a
630	Diemolding Corporation	HAIR CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 941.46	n/a	n/a
632	GCI Technologies	CONTRARIAN FUNDS LLC	Resolved	10/18/2005	\$ 5,981.92	n/a	n/a
641	Veritas Software Corporation	VERITAS SOFTWARE CORPORATION	Resolved	10/19/2005	\$ 7,909.10	n/a	n/a
642	ITT Industries, Inc.	ITT CANNON NEWTON	Resolved	10/18/2005	\$ 11,604.80	n/a	n/a
644	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 898.38	n/a	n/a
645	Camoplast Thermoplastic Group	CONTRARIAN FUNDS LLC AS ASSIGNEE OF CAMOPLAST INCORPORATED	Resolved	10/14/2005	\$ 88,544.81	n/a	n/a
652	Optrex America Inc.	OPTREX AMERICA INC	Resolved	10/20/2005	\$ 25,974.39	n/a	n/a
653	Precision Resource, Inc.	PRECISION RESOURCE INC KY DIV	Resolved	10/20/2005	\$ 13,539.00	n/a	n/a
657	Phillips Plastics Corporation	CONTRARIAN FUNDS LLC	Resolved	10/18/2005	\$ 9,001.06	n/a	n/a
661	Maxim Integrated Products, LLC.	MAXIM INTEGRATED PRODUCTS INC	Resolved	10/18/2005	\$ 22,730.81	n/a	n/a
662	Trelleborg Palmer Chenard	SOL - TRELLEBORG PALMER CHENARD	Resolved	10/18/2005	\$ 3,477.60	n/a	n/a
665	United Machining, Inc.	UNITED MACHINING INC	Resolved	10/17/2005	\$ 1,532.85	n/a	n/a
668	HITACHI AUTOMOTIVE PRODUCTS	DEUTSCHE BANK SECURITIES INC	Resolved	10/18/2005	\$ 27,569.59	n/a	n/a
678	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 1,819.75	n/a	n/a
679	Millwood, Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 300.00	n/a	n/a
684	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 2,000.00	n/a	n/a
695	Gemini Group, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SIERRA PLASTICS INC AKA SIERRA EL PASO/CONTRARIAN FUNDS LLC AS ASSIGNEE OF GEMINI PLASTICS INC	Resolved	10/14/2005	\$ 14,138.65	n/a	n/a
697	Diodes Incorporated	DIODES INCORPORATED	Resolved	10/18/2005	\$ 1,421.23	n/a	n/a
701	Parker-Hannifin Corporation, Parker Seals	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 3,621.90	n/a	n/a
703	Wakefield Thermal Solutions	WAKEFIELD THERMAL SOLUTIONS	Resolved	10/18/2005	\$ 186.68	n/a	n/a
707	Midwest Stamping, Inc.	MIDWEST STAMPING INC	Resolved	10/20/2005	\$ 1,242.18	n/a	n/a
719	Electronic Services, LLC, d.b.a. CSI Electronics	CONTRARIAN FUNDS LLC AS ASSIGNEE OF ELECTRONIC SERVICES LLC DBA CSI ELECTRONICS	Resolved	10/20/2005	\$ 29,610.00	n/a	n/a
723	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 429.53	n/a	n/a
725	Avnet, Inc.	AVNET INC	Resolved	10/20/2005	\$ 67,613.23	n/a	n/a
728	Security Plastics Division/NMC, LLC	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SP DIV NMC LLC	Resolved	10/18/2005	\$ 5,367.21	n/a	n/a
729	Contrarian Capital Management LLC	BANK OF AMERICA N A/CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 57,484.77	n/a	n/a
732	Photo Stencil, LLC	CONTRARIAN FUNDS LLC	Resolved	10/20/2005	\$ 5,295.00	n/a	n/a
747	Standard Microsystems Corporation	STANDARD MICROSYSTEMS CORPORATION	Resolved	10/20/2005	\$ 19,067.40	n/a	n/a
753	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 19,657.49	n/a	n/a
756	Fujikoki America, Inc.	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/13/2005	\$ 102,600.39	n/a	n/a
758	Parker- Hannifin, Eng.Seals Division	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 3,679.78	n/a	n/a
765	United Stars Industries, Inc.	CONTRARIAN FUNDS LLC AS TRANSFEREE OF UNITED STARS INDUSTRIES INC	Resolved	10/24/2005	\$ 11,853.70	n/a	n/a
768	NMB Technologies Corporation	LONGACRE MASTER FUND LTD	Resolved	10/20/2005	\$ 4,056.80	n/a	n/a
771	Engelhard Corporation	BLUE ANGEL CLAIMS LLC	Resolved	10/11/2005	\$ 85,576.07	n/a	n/a
772	Premier Products, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/17/2005	\$ 10,671.05	n/a	n/a
775	CoorsTek, Inc.	COORSTEK INC	Resolved	10/10/2005	\$ 30,318.20	n/a	n/a
776	KL Industries, Inc.	ARGO PARTNERS	Resolved	10/14/2005	\$ 4,872.55	n/a	n/a
779	MacArthur Corporation	JPMORGAN CHASE BANK NA	Resolved	10/13/2005	\$ 154,170.00	n/a	n/a
782	Parker Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 47,748.95	n/a	n/a
786	Wako Electronics (USA) Inc.	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 4,244.00	n/a	n/a
795	Phillips Optical Storage	LATIGO MASTER FUND LTD	Resolved	10/12/2005	\$ 34,369.12	n/a	n/a
797	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 339.51	n/a	n/a
798	GKN Sinter Metals Limited	DEUTSCHE BANK SECURITIES INC	Resolved	10/17/2005	\$ 11,600.00	n/a	n/a
800	Philips Semiconductors, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/12/2005	\$ 194,274.52	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
802	Mobile Display Systems	MOBILE DISPLAY SYSTEMS	Resolved	10/14/2005	\$ 25,930.54	n/a	n/a
804	Tal-Port Industries, LLC/Stonehill Institutional Partners L.P.	STONEHILL INSTITUTIONAL PARTNERS LP	Resolved	10/14/2005	\$ 30,013.94	n/a	n/a
805	Speedline Technologies, Inc.	TPG CREDIT OPPORTUNITIES INVESTORS LP	Resolved	10/19/2005	\$ 189,005.00	n/a	n/a
807	Assembleon America, Inc.	LATIGO MASTER FUND LTD	Resolved	10/21/2005	\$ 13,170.09	n/a	n/a
811	Schleuniger, Inc.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 15,470.75	n/a	n/a
816	Northern Engraving Corporation	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 35,503.86	n/a	n/a
817	PD George Co.	LONGACRE MASTER FUND LTD	Resolved	10/18/2005	\$ 4,723.53	n/a	n/a
818	Seal Design, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/20/2005	\$ 1,388.63	n/a	n/a
820	Futaba Corporation of America	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 197,369.77	n/a	n/a
823	Rosemount Analytical	ROSEMOUNT ANALYTICAL	Resolved	10/20/2005	\$ 1,340.00	n/a	n/a
824	Viking Plastics	ASM CAPITAL LP	Resolved	10/11/2005	\$ 5,547.35	n/a	n/a
826	Worthington Precision Metals, Inc.	SOL - WORTHINGTON PRECISION METALS INC	Resolved	10/14/2005	\$ 23,230.90	n/a	n/a
829	MN Corporation	MADISON INVESTMENT TRUST SERIES 38	Resolved	10/12/2005	\$ 25,163.47	n/a	n/a
832	Omron Dualtec Automotive Electronics, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF OMRON DUALTEC AUTOMOTIVE ELECTRONICS INC	Resolved	10/11/2005	\$ 85,411.74	n/a	n/a
834	CTS Corporation	CTS CORPORATION	Resolved	10/10/2005	\$ 49,457.69	n/a	n/a
836	AVM, Inc.	AVM INDUSTRIES LLC	Resolved	10/12/2005	\$ 1,988.61	n/a	n/a
838	Daishinku (America) Corp. d/b/a KDS America	DAISHINKU AMERICA CORP DBA KDS AMERICA	Resolved	10/17/2005	\$ 15,181.24	n/a	n/a
840	Coats American, Inc.	COATS AMERICAN INC	Resolved	10/14/2005	\$ 3,170.89	n/a	n/a
841	Alps Automotive, Inc.	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/18/2005	\$ 37,893.60	n/a	n/a
843	First Technology Holdings, Inc.	FIRST TECHNOLOGY HOLDINGS INC AND AFFILIATES AND SUBSIDIARIES AND CONTROL DEVICES INC AND FIRST INERTIA SWITCH LIMITED	Resolved	10/16/2005	\$ 23,525.65	n/a	n/a
849	Dell Receivables	DELL INC	Resolved	10/18/2005	\$ 12,218.83	n/a	n/a
852	Texas Instruments	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/17/2005	\$ 64,270.14	n/a	n/a
857	CTS Automotive Products	CTS CORPORATION	Resolved	10/10/2005	\$ 3,735.50	n/a	n/a
858	Micronas	MICRONAS GMBH	Resolved	10/27/2005	\$ 18,090.00	n/a	n/a
859	Precision Fitting and Gauge Co.	PRECISION FITTING & GAUGE CO	Resolved	10/27/2005	\$ 892.00	n/a	n/a
863	NSK Corporation	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 26,521.34	n/a	n/a
864	Coilcraft Inc.	COILCRAFT INC	Resolved	10/12/2005	\$ 4,434.68	n/a	n/a
865	PlastiCert	ARGO PARTNERS	Resolved	10/18/2005	\$ 9,978.00	n/a	n/a
867	Schleuniger	HAIN CAPITAL HOLDINGS LLC	Resolved	10/21/2005	\$ 17,095.00	n/a	n/a
869	Transfer Tool Products, Inc.	TRANSFER TOOL PRODUCTS INC	Resolved	10/13/2005	\$ 1,186.74	n/a	n/a
883	Fujitsu Components America, Inc.	FUJITSU COMPONENTS AMERICA INC	Resolved	10/27/2005	\$ 2,018.40	n/a	n/a
884	Parker Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 3,151.81	n/a	n/a
887	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 339.94	n/a	n/a
888	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 998.52	n/a	n/a
889	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/11/2005	\$ 10,551.65	n/a	n/a
892	Parker Seals	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 1,787.81	n/a	n/a
904	The Lighting Company	THE LIGHTING COMPANY	Resolved	10/14/2005	\$ 791.97	n/a	n/a
905	DuPont Powder Coatings LLC	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 8,317.35	n/a	n/a
908	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/07/2005	\$ 153.83	n/a	n/a
911	Metal Surfaces, Inc.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 14,486.60	n/a	n/a
915	Engineered Materials Solutions	HAIN CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 43,198.89	n/a	n/a
916	Key Safety Systems, Inc.	KEY SAFETY SYSTEMS & SUBSIDIARIES	Resolved	10/14/2005	\$ 3,803.60	n/a	n/a
					\$ 16,181,727.91	\$ 18,802,421.99	

EXHIBIT B

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UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK

Case No. 05-44481

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In the Matter of:

DELPHI CORPORATION,

Debtor.

- - - - -x

U.S. Bankruptcy Court

One Bowling Green

New York, New York

August 17, 2006

10:05 a.m.

B E F O R E:

HON. ROBERT D. DRAIN

U.S. BANKRUPTCY JUDGE

1 MOTION For Relief From Stay The Offshore Group's Motion
2 Pursuant To Bankruptcy Code Sections 362(D)(1) And 553 For
3 Order Lifting The Automatic Stay To Permit The Offshore Group
4 To Exercise Right Of Setoff

5
6 EX PARTE Motion To File Under Seal Exhibits To The Official
7 Committee Of Unsecured Creditors' Motion For An Order
8 Authorizing It To Prosecute The Debtors' Claims And Defenses
9 Against General Motors Corporation And Certain Former Officers
10 Of The Debtors

11
12 APPLICATION To Employ Fee Committee's Application For An Order
13 Authorizing Retention Of Legal Cost Control As Fee And Expense
14 Analyst, Nunc Pro Tunc To June 1, 2006, Pursuant To Sections
15 327(A) And 328 Of The Bankruptcy Code

16
17 MOTION To Authorize Motion For Order Under 11 U.S.C. Section
18 365 And Fed. R. Bankr. P. 6006 Authorizing (I) Rejection Of
19 Remaining Executory Contracts Of MobileAria, Inc. And (II)
20 Assumption And Assignment Of Executory Contract With DPAC
21 Technologies Corp.

1 MOTION To Approve Motion For Approval Of Joint Interest
2 Agreement Between Debtors And Official Committee Of Equity
3 Security Holders And Implementation Of Protective Order With
4 Respect Thereto

5
6 MOTION To Approve / Motion Pursuant To Sections 105, 328(A) And
7 1103 Of The Bankruptcy Code And Bankruptcy Rule 2014 For Order
8 Granting The Official Committee Of Equity Security Holders
9 Leave To File An Application To Retain And Employ A Financial
10 Advisor

11
12 AMENDED Motion For Relief From Stay Filed By Douglas M. Tisdale
13 On Behalf Of Nutech Plastics Engineering, Inc

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15 MOTION For Reclamation Of Claim (For Order Directing Return Of
16 Reclaimed Equipment Or For Immediate Payment Thereof)

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24 Transcribed By: Esther Accardi
25

1 A P P E A R A N C E S :

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1 P R O C E E D I N G S

2 THE COURT: Please be seated. Okay. Delphi.

3 MR. BUTLER: Your Honor, good morning. Jack Butler
4 and Kayalyn Marafioti and Tom Matz here on behalf of Delphi
5 Corporation for its August omnibus hearing. We have filed,
6 Your Honor, the proposed tenth omnibus hearing agenda and we'll
7 follow that order if that's acceptable to the Court.

8 THE COURT: Okay. Yeah, that's fine.

9 MR. BUTLER: Your Honor, the first matter on the
10 agenda matter number 1 is the Offshore Groups lift stay motion,
11 filed at docket number 28111. That's being handled by the
12 Togut firm. Mr. Berger's here to report to the Court.

13 THE COURT: Okay.

14 MR. BERGER: Good morning, Judge. Neil Berger, Togut
15 Segal & Segal for the debtors. Your Honor, this matter has
16 been settled it's between Delphi and Offshore so that
17 Offshore's setoff amount has been substantially reduced under
18 paragraph 18 of the final dip order in the case. The unsecured
19 creditors' committee has an opportunity to review that proposed
20 settlement. We hope in the next few days to have the back up
21 package of the settlement sent to the committees' professionals
22 and our goal is to have a stipulation submitted before the
23 September omnibus hearing. So for purposes of the agenda we
24 ask that it be adjourned.

25 THE COURT: Okay. That's fine.

1 case law because the goods at issue here are equipment rather
2 than inventory. We don't see any basis in the UCC Warrant
3 Section 546(c) for distinguishing equipment from inventory for
4 the purpose of apply the extent case law. With respect to Mr.
5 Butler's comments Your Honor and the Court's disposition of
6 today's motion I would point out that in the prayer that was
7 contained at the end of our objection we did not ask for a
8 declaratory judgment with respect to the validity of
9 reclamation claims in this case in general. We only asked that
10 the motion of Speedline be denied. That is, in fact, what we
11 think is appropriate based upon the arguments that have been
12 made by counsel for Speedline and the authorities that have
13 been cited to Your Honor by the committee in its objection.

14 THE COURT: Okay.

15 MR. SEIDER: Thank you, Your Honor.

16 THE COURT: All right. I have in front me a motion
17 by Speedline which has filed a reclamation demand and asserts a
18 reclamation claim in these cases for, or related to its
19 provision of a specific piece of property to the debtors on
20 credit. It's objected to on essentially a similar grounds on
21 by both the debtors and the official unsecured creditors'
22 committee. The objections raise one common issue and two other
23 issues and I conclude that based on my view of the common issue
24 I do not need to get to the other issues. The other issues
25 being whether in fact Speedline has satisfied the hurdles

1 specifically set forth in Section 546(c) of the bankruptcy
2 code. Including establishing that its debtor was insolvent at
3 the relevant time. That determination, as well as
4 determination in any of the other reserved defenses, needn't be
5 made at this time. Given my view that because the debt that is
6 secured by the asset that serves as the basis for Speedline's
7 reclamation claim is in excess of that claim and has neither
8 been satisfied nor released. At this time Speedline is not
9 entitled to the rights that it would have under the Court's
10 order establishing procedures for the treatment of reclamation
11 claims dated November 4, 2005. Which provides among other
12 things for the allowance of an administrative claim for an
13 allowed reclamation claim and payment of such claim in the sole
14 discretion of the debtors or pursuant to a confirmed plan of
15 reorganization. In either case only if and to the extent that
16 such allowed reclamation claim constituted administrative
17 expenses under applicable law as set forth in paragraph
18 2(d)(ii) of that order. The statute governing this issue is
19 Section 546(c) of the bankruptcy code as I mentioned a minute
20 ago as an effect before the effective date of the 2005 BAP CPA
21 amendments to the bankruptcy code. And its well settled that
22 under that section a reclaiming creditor does not have an
23 independent right of reclamation but that that section only
24 preserves any right the seller may have outside a bankruptcy.
25 See for example, In re Quality Stores, Inc. 289 BR 324, 333

1 Bankruptcy W.D. Michigan (2003), and In re Pittsburgh-Canfield
2 Corporation 309 BR 277, 6th Circuit BAP (2004). The parties I
3 think are all in agreement and even if they weren't this would
4 be the law that therefore, the Court must look to the
5 reclamation claimant's rights under Section 27023 of the
6 uniform commercial code. That section subjects the rights of a
7 reclamation creditor under Section 27022 to the rights of a
8 buyer in the ordinary course or other good faith purchaser.
9 And case law has established that a creditor with a prior
10 perfected floating security interest or a secured instant
11 property generally who acted in good faith and per value is a
12 good faith purchaser for purposes of that section. See for
13 example In re Oralco 239 BR 261, 267 Bankruptcy SDNY (1999).
14 Under the prevailing, and in my view, correct version of the
15 case law including as set forth in the Oralco case, but also as
16 discussed at length, encodently in the Pittsburgh-Canfield
17 case. Consequently, a reclaiming creditor does not have a
18 right of reclamation until it is established that either the
19 secured creditor, with a prior interest in its particular
20 asset, has released the interest in that asset or has been paid
21 in full. I.e. that there are surplus proceeds from the asset
22 that the reclaiming creditor seeks to reclaim. That clearly
23 has not happened here. The case law also makes it clear that
24 the reclaiming creditor has what is in essence an inrem right
25 or literally an inrem right. And until it is established that

1 again the prior creditor has either been satisfied out of the
2 proceeds of that particular property from which the reclaiming
3 creditor's rights stem or has released its lien, the value of
4 the reclaiming creditor's inrem right is zero. The Pittsburgh-
5 Canfield case specifically dealt with the issue raised in the
6 motion which was that the Court should look at whether the
7 collateral package, as a whole, held by the secured creditor
8 would satisfy the creditor. And therefore should be directed
9 to make a determination that the secured creditor does not need
10 the particular asset that is the basis for the reclamation
11 claim. And in that case properly rejected that argument. I
12 should note that even with the change to the bankruptcy code
13 after the applicability of BAP CPA the leading commentator in
14 this area is of the view that the pre BAP CPA cases would still
15 apply. And in particular, that a reclaiming seller whose right
16 is subject to that of a secured creditor may not invoke the
17 equitable principal of marshalling or a similar principal to
18 require a senior secured creditor to look to assets in which
19 the seller has no interest. See Five Collier on bankruptcy
20 paragraph 546.042(a)(vii) and in so concluding the editors of
21 Collier site the Oralco case at 239 BR 27477 Bankruptcy SDNY
22 (1999). In response to that case law the reclaiming selling
23 here contends that the provisions of Section 546(c) are
24 intended only to protect the secured creditor and that the
25 secured creditor here, by failing to object to the motion has

1 waived its rights as a secured creditor. And consequently the
2 reclaiming creditor may take over the secured creditor. There
3 are two problems with this argument. The first is that the
4 case law again, I believe correctly, does not -- or at least
5 the majority case law takes the position that Section 546(c)'s
6 reference to otherwise applicable rights of the reclaiming
7 creditor protects not only secured creditors but unsecured
8 creditors from having a reclaiming seller, who under applicable
9 non-bankruptcy law, would have a zero-valued reclamation claim
10 from obtaining an unearned or unmerited priority. Again see
11 the Pittsburgh-Canfield case as well as In re Primary Health
12 Systems Inc. 258 BR 111 at 117 Bankruptcy District of Delaware
13 (2001) which noted that elevating such a claim to
14 administrative status in a bankruptcy case would give the
15 claimant a windfall. As is frequently noted by the Court's,
16 including most recently by the Supreme Court in its decision
17 last term in the Howard case, priorities are to be determined
18 narrowly in bankruptcy given the fact that any priority takes
19 money out of the pocket of those who do not have a priority.
20 Secondly, given that case law and also given the process laid
21 out in the Court's November 2004 order, dealing with the
22 processing and treatment of reclamation claims, I could not
23 find here a knowing and intelligent waiver by the secured
24 creditors even if for some reason I disagreed with that case
25 law. To the contrary, I think the secured creditors here could

1 reasonably assume that those below them in the pecking order
2 i.e., the unsecured creditors as well as the debtor, acting as
3 a fiduciary for its estate, would responsibly protect the
4 estate and the secured creditors from reclamation sellers
5 obtaining a windfall or prematurely obtaining administrative
6 status. I also don't accept the argument made by Speedline
7 that the foregoing cases that I cited are distinguishable on
8 their facts on the basis that in those cases the reclaiming
9 seller claimed items of inventory or the proceeds thereof as
10 opposed to a specific piece of property. That distinction is
11 not one that is consistent with the logic of those cases, which
12 specifically addressed the issue I discussed without making a
13 distinction among types of collateral. But merely pointing to
14 the respective positions of a reclaiming seller when an asset
15 has been sold and there are excess proceeds. And when it has
16 not yet been sold and the debt that it secures exceeds the
17 value of the reclamation claim. So, again, in connection with
18 this statutory priority which is out of the ordinary course,
19 given that it's provided to a pre-petition claim only pursuant
20 to 546(c), I can't find any value today that would lead to the
21 allowance today of a specific dollar amount administrative
22 claim. And certainly there would be no requirement under the
23 Court's order for payment of such amount today. This is not to
24 say that the reclamation right has disappeared. In my view,
25 and based on my review of the case law, until the secured

1 creditor with the prior right under Section 27023 has either
2 been satisfied or it is clear from the liquidation of its
3 collateral that it will not be satisfied, or has released its
4 lien, the reclaiming seller's rights under 546 essentially hang
5 fire. Assuming, of course, it's able to establish its right
6 under all the other hurdles of 546(c). So consequently, I
7 don't accept that the right based on my finding today no longer
8 exists. It is one that is, at this time, of no value. But
9 that at some time in the future, depending on the ultimate
10 disposition of the secured creditor's claim in this case, may
11 have value and may be entitled to an administrative claim. So
12 Mr. Butler you can submit an order with a copy to Speedline's
13 counsel and the committee's counsel consistent with that
14 ruling.

15 MR. BUTLER: Thank you, Your Honor. That concludes
16 the matters for this morning's omnibus hearing. Just to note,
17 Your Honor, I'd like to state in open court, pursuant to
18 authority that was granted to us by chambers, we did file a
19 notice on Pacer very early this morning and served the
20 1113/1114 trial counsel and also filed on notice, on
21 Delphidocket.com, that in lieu of the resumption of the
22 1113/1114 hearing this afternoon there is in this courtroom a
23 meeting confer among trial counsel at 2 p.m. New York time
24 followed by a chamber's conference at 3 o'clock New York time.
25 Both of those conferences are limited to the debtors and the

1 respondents to the motion. And at least as it stands now, that
2 trial is scheduled to resume at 10 a.m. tomorrow.

3 THE COURT: Okay. All right. And if we meet and
4 confer, which I'm happy to have in the courtroom, outside of my
5 presence of course, you can also use the conference room if
6 various parties want to break off and talk a moment among
7 themselves. Just let my chambers know if you need that room.
8 We'll open it up for you. So I'll see you at 3.

9 MR. BUTLER: Thank you, Your Honor.

10 THE COURT: And that's off the record, right?

11 MR. BUTLER: Yes.

12 THE COURT: Fine. Thank you.

13 (Proceedings concluded at 11:05 a.m.)
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I N D E X

RULINGS

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C E R T I F I C A T I O N

I, Esther Accardi, court approved transcriber, certify that the foregoing is a correct transcript from the official electronic sound recording of the proceedings in the above-entitled matter.

Signature of Transcriber Date

Signature of Transcriber Date

Signature of Transcriber Date

Signature of Transcriber Date

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	x	

ORDER UNDER 11 U.S.C. § 546(c) AND AMENDED RECLAMATION
PROCEDURES ORDER CLASSIFYING RECLAMATION CLAIMS AS
GENERAL UNSECURED NONPRIORITY CLAIMS FOR ALL PURPOSES

("ORDER DETERMINING RECLAMATION CLAIMS")

Upon the expedited motion, dated June 5, 2009 (the "Motion"), of Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), for an order pursuant to 11 U.S.C. § 546 and the Second Amended And Restated Final Order Under 11 U.S.C. §§ 362, 503, And 546 And Fed. R. Bankr. P. 9019 Establishing Procedures For Treatment Of Reclamation Claims (Docket No. 10409) classifying reclamation claims identified in Exhibit A attached hereto (the "Reclamation Claims") as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization; and upon the record of the hearing held on the Motion; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. This Court has core jurisdiction over these chapter 11 cases and the parties and property affected hereby pursuant to 28 U.S.C. §§ 157(b) and 1334. Venue of this proceeding and this Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The Motion is hereby granted in its entirety.

3. The Reclamation Claims shall be classified as general unsecured nonpriority claims for all purposes, including for purposes of voting and distribution under any plan of reorganization of the Debtors.

4. This Court shall retain jurisdiction to hear and determine any and all matters arising from the implementation of this order.

Dated: New York, New York
June __, 2009

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
27	Alcoa Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Unresolved	10/10/2005	n/a	\$ 2,760,429.64	\$ 492,799.17
32	PBR Columbia L.L.C.	PBR COLUMBIA LLC	Unresolved	10/10/2005	n/a	\$ 1,043,145.33	\$ 1,780.09
75	PBR Knoxville LLC	SPECIAL SITUATIONS INVESTING GROUP INC	Unresolved	10/10/2005	n/a	\$ 3,443,149.25	\$ -
109	AFL Automotive L.P.	AFL AUTOMOTIVE LP TEXAS LIMITED PARTNERSHIP/SPCP GROUP LLC	Unresolved	10/11/2005	n/a	\$ 373,129.95	\$ 51,983.34
110	AVON AUTOMOTIVE, INC.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF CADILLAC RUBBER & PLASTICS INC	Unresolved	10/11/2005	n/a	\$ 715,920.17	\$ 96,919.23
317	Citation Corporation	JP MORGAN CHASE BANK	Unresolved	10/12/2005	n/a	\$ 543,312.80	\$ 72,015.84
337	Yazaki North America, Inc.	YAZAKI NORTH AMERICA INC	Unresolved	10/11/2005	n/a	\$ 555,103.78	\$ 11,357.23
372	Ideal Tool Co. Inc.	SOL - IDEAL TOOL CO INC	Unresolved	10/14/2005	n/a	\$ 630,913.33	\$ 118,258.54
383	Coherent, Inc.	LONGACRE MASTER FUND LTD	Unresolved	10/13/2005	n/a	\$ 202,500.00	\$ 202,500.00
529	Siemens VDO Automotive Corporation	GOLDMAN SACHS CREDIT PARTNERS LP ASSIGNEE OF SIEMENS VDO AUTOMOTIVE CORPORATION AND SIEMENS VDO AUTOMOTIVE INC	Unresolved	10/17/2005	n/a	\$ 5,186,958.58	\$ 217,346.39
713	Phillips & Temro Industries Inc.	PHILLIPS & TEMRO INDUSTRIES LTD	Unresolved	10/21/2005	n/a	\$ 104,732.46	\$ -
750	Foreman Tool & Mold Corporation	SOL - FOREMAN TOOL & MOLD CORP/ STONEHILL INSTITUTIONAL PARTNERS LP	Unresolved	10/17/2005	n/a	\$ 131,194.96	\$ 27,713.06
763	Textron Fastening Systems	GOLDMAN SACHS CREDIT PARTNERS LP	Unresolved	10/23/2005	n/a	\$ 2,803,310.85	\$ 65,958.81
842	Trans Tron, Ltd., Inc.	BEAR STEARNS INVESTMENT PRODUCTS INC	Unresolved	10/11/2005	n/a	\$ 301,669.56	\$ 9,609.15
847	Textron Fastening Systems	GOLDMAN SACHS CREDIT PARTNERS LP	Unresolved	10/26/2005	n/a	\$ 6,951.33	\$ 40.65
1	Small Parts	SMALL PARTS INC	Resolved	10/04/2005	\$ 32,169.54	n/a	n/a
5	S&Z Tool and Die Co., INC	LIQUIDITY SOLUTIONS INC	Resolved	10/08/2005	\$ 111,882.90	n/a	n/a
6	SyZ Rolmex, S. de R.L. de C.V.	LIQUIDITY SOLUTIONS INC	Resolved	10/08/2005	\$ 4,000.00	n/a	n/a
7	Trostel, Ltd	CONTRARIAN FUNDS LLC AS ASSIGNEE OF TROSTEL LTD	Resolved	10/09/2005	\$ 16,194.53	n/a	n/a
8	Steel Technologies, Inc	STEEL TECHNOLOGIES INC	Resolved	10/08/2005	\$ 52,310.89	n/a	n/a
10	Hitachi Chemical (Singapore) Pte. Ltd.	HITACHI CHEMICAL SINGAPORE PTE LTD FKA HITACHI CHEMICAL ASIA PACIFIC PTE LTD	Resolved	10/10/2005	\$ 219,986.79	n/a	n/a
11	ARC Automotive, Inc	ARC AUTOMOTIVE INC	Resolved	10/10/2005	\$ 218,571.21	n/a	n/a
12	U.S. Silica Company	US SILICA COMPANY	Resolved	10/10/2005	\$ 6,000.00	n/a	n/a
13	Material Sciences Corporation	MATERIAL SCIENCES CORPORATION	Resolved	10/10/2005	\$ 39,830.12	n/a	n/a
16	Curtis Screw Company, LLC	MADISON NICHE OPPORTUNITIES LLC	Resolved	10/08/2005	\$ 52,906.09	n/a	n/a
18	Unifrax Corporation	UNIFRAX CORPORATION	Resolved	10/10/2005	\$ 25,878.10	n/a	n/a
21	Novelis Corporation	CONTRARIAN FUNDS LLC	Resolved	10/10/2005	\$ 33,090.25	n/a	n/a
22	Wellman, Inc.	WELLMAN INC	Resolved	10/10/2005	\$ 28,575.50	n/a	n/a
24	GKN Sinter Metals	DEUTSCHE BANK SECURITIES INC	Resolved	10/10/2005	\$ 32,312.82	n/a	n/a
25	Flow Dry Technology Ltd.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF FLOW DRY TECHNOLOGY LTD	Resolved	10/10/2005	\$ 42,727.58	n/a	n/a
26	PTI Engineered Plastics, Inc.	ARGO PARTNERS	Resolved	10/10/2005	\$ 620.00	n/a	n/a
35	HK Metalcraft Mfg Corp	HK METAL CRAFT MFG CORP	Resolved	10/10/2005	\$ 1,533.05	n/a	n/a
38	NEC Electronics America, Inc.	JPMORGAN CHASE BANK NA	Resolved	10/08/2005	\$ 3,424,138.98	n/a	n/a
40	Judd Wire, Inc.	JP MORGAN CHASE BANK	Resolved	10/09/2005	\$ 232,871.66	n/a	n/a
41	Hammond Group, Inc.	LIQUIDITY SOLUTIONS INC AS ASSIGNEE OF HAMMOND GROUP INC	Resolved	10/10/2005	\$ 15,397.30	n/a	n/a
45	SKF USA, INC	SKF USA INC	Resolved	10/10/2005	\$ 85,147.45	n/a	n/a
47	Victory Packaging	VICTORY PACKAGING LP	Resolved	10/08/2005	\$ 658,509.45	n/a	n/a
49	HK Metal Craft Manufacturing Corp.	HK METAL CRAFT MANUFACTURING CORP	Resolved	10/10/2005	\$ 572.00	n/a	n/a
50	HK Metalcraft Manufacturing Corporation-Packard	HK METAL CRAFT MANUFACTURING CORP	Resolved	10/10/2005	\$ 3,850.28	n/a	n/a
51	Thaler Machine Company	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 31,412.25	n/a	n/a
52	Select Industries Corp.	SELECT INDUSTRIES CORPORATION FKA SELECT TOOL & DIE CORP	Resolved	10/10/2005	\$ 20,736.60	n/a	n/a
53	INA USA Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF INA USA CORPORATION	Resolved	10/10/2005	\$ 233,212.96	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
54	Robin Mexicana, S. de R.L. de C.V.	ROBIN MEXICANA S DE RL DE CV	Resolved	10/10/2005	\$ 47,982.69	n/a	n/a
55	Robin Industries, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 81,341.20	n/a	n/a
56	Robin Industries	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 58,220.01	n/a	n/a
57	Valeo Switches & Detection Systems, Inc	VALEO SWITCHES AND DETECTION SYSTEMS INC	Resolved	10/10/2005	\$ 1,653.86	n/a	n/a
61	Eagle Picher Automotive	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 20,001.80	n/a	n/a
62	Integrated Logistics Solutions	INTEGRATED LOGISTICS SOLUTIONS	Resolved	10/10/2005	\$ 1,057.80	n/a	n/a
68	FAG Automotive	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SCHAEFFLER CANADA INC	Resolved	10/10/2005	\$ 80,774.09	n/a	n/a
69	Angell-Demmel North America	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 13,807.69	n/a	n/a
70	Teleflex, Incorporated	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/10/2005	\$ 57,003.23	n/a	n/a
71	Carolina Forge Co. LLC	JPMORGAN CHASE BANK NA	Resolved	10/11/2005	\$ 197,519.25	n/a	n/a
72	Meadville Forging Co	JPMORGAN CHASE BANK NA	Resolved	10/10/2005	\$ 213,681.48	n/a	n/a
73	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 5,830.84	n/a	n/a
76	Ken-Mac Metals	HAIN CAPITAL INVESTORS LLC	Resolved	10/10/2005	\$ 55,022.63	n/a	n/a
82	American & Efird	AMROC INVESTMENTS LLC	Resolved	10/10/2005	\$ 8,323.61	n/a	n/a
83	Prestolite Wire Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF PRESTOLITE WIRE CORPORATION	Resolved	10/10/2005	\$ 16,141.07	n/a	n/a
90	Cascade Die Casting Group, Inc	CASCADE DIE CASTING GROUP	Resolved	10/10/2005	\$ 11,105.86	n/a	n/a
93	ChicagoRivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/11/2005	\$ 2,133.34	n/a	n/a
95	Parkview Metal Products Inc	PARKVIEW METAL PRODUCTS	Resolved	10/10/2005	\$ 17,050.64	n/a	n/a
96	Strattec Security Corp	CONTRARIAN FUNDS LLC AS ASSIGNEE OF STRATTEC SECURITY CORP	Resolved	10/10/2005	\$ 43,124.50	n/a	n/a
97	TRANS-MATIC MFG Co Inc	REDROCK CAPITAL PARTNERS LLC	Resolved	10/11/2005	\$ 6,207.62	n/a	n/a
98	Quality Synthetic Rubber Inc.	QUALITY SYNTHETIC RUBBER INC	Resolved	10/11/2005	\$ 187,197.76	n/a	n/a
99	Rohm Electronics USA LLC	ROHM ELECTRONICS USA LLC	Resolved	10/10/2005	\$ 107,101.70	n/a	n/a
100	3M Company	3M COMPANY	Resolved	10/11/2005	\$ 34,337.94	n/a	n/a
102	CTS Corp	CTS CORPORATION	Resolved	10/11/2005	\$ 28,261.53	n/a	n/a
104	Pridgeon & Clay, Inc.	PRIDGEON & CLAY INC	Resolved	10/10/2005	\$ 54,023.95	n/a	n/a
105	Park-Ohio Products, Inc.	PARK OHIO PRODUCTS INC	Resolved	10/11/2005	\$ 45,060.80	n/a	n/a
108	Engineered Plastic Components	AFL AUTOMOTIVE LP TEXAS LIMITED PARTNERSHIP/AFL AUTOMOTIVE LIMITED PARTNERSHIP MICHIGAN LIMITED PARTNERSHIP/SPCP GROUP LLC	Resolved	10/12/2005	\$ 234,212.10	n/a	n/a
111	Magnesium Aluminum Corporation	AMROC INVESTMENTS LLC	Resolved	10/11/2005	\$ 36,684.88	n/a	n/a
112	Fawn Industries	FAWN PLASTICS CO INC	Resolved	10/11/2005	\$ 26,190.18	n/a	n/a
120	OSRAM Opto Semiconductors Inc	OSRAM OPTO SEMICONDUCTORS INC	Resolved	10/11/2005	\$ 88,989.40	n/a	n/a
122	Brazeway, Inc	JPMORGAN CHASE BANK NA AS ASSIGNEE OF BRAZEWAY INC	Resolved	10/11/2005	\$ 101,905.91	n/a	n/a
123	J&F Steel LLC/Ryerson Tull	JOSEPH T RYERSON & SON INC	Resolved	10/10/2005	\$ 4,903.55	n/a	n/a
124	Valeo Wiper Systems	VALEO ELECTRICAL SYSTEMS INC WIPERS DIVISION	Resolved	10/12/2005	\$ 8,518.50	n/a	n/a
125	Valeo	VALEO CLIMATE CONTROL CORPORATION	Resolved	10/10/2005	\$ 156,725.41	n/a	n/a
126	Mubea	MUBEA INC	Resolved	10/11/2005	\$ 132,206.98	n/a	n/a
128	MTD Technologies	CONTRARIAN FUNDS LLC AS ASSIGNEE OF MTD TECHNOLOGIES INC	Resolved	10/12/2005	\$ 16,294.70	n/a	n/a
130	Republic Engineered Products, Inc.	AMROC INVESTMENTS LLC	Resolved	10/10/2005	\$ 305,961.91	n/a	n/a
131	Sony Electronics Inc.	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 12,250.00	n/a	n/a
135	Robin Industries, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 4,266.38	n/a	n/a
136	Robin Industries, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 20,668.09	n/a	n/a
137	Robin Industries, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 27,814.26	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
146	Affinia Canada Corp.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 10,000.00	n/a	n/a
149	Sharp Electronics Corporation	LONGACRE MASTER FUND LTD AS ASSIGNEE/TRANSFEE OF SHARP ELECTRONICS CORP	Resolved	10/11/2005	\$ 40,000.00	n/a	n/a
153	Molex Connector Corporation	TPG CREDIT STRATEGIES FUND LP	Resolved	10/11/2005	\$ 325,797.70	n/a	n/a
157	Cardone Industries, Inc	CARDONE INDUSTRIES INC	Resolved	10/12/2005	\$ 9,760.00	n/a	n/a
158	Muskegon Casting Corp.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 11,566.85	n/a	n/a
163	Eaton Corporation	LIQUIDITY SOLUTIONS INC AS ASSIGNEE OF EATON CORPORATION	Resolved	10/10/2005	\$ 107,257.28	n/a	n/a
165	Precision Stamping	SPCP GROUP LLC AS ASSIGNEE OF PRECISION DIE & STAMPING INC	Resolved	10/12/2005	\$ 16,615.31	n/a	n/a
166	Johnson Battery Company, Inc.	JOHNSON BATTERY COMPANY INC	Resolved	10/12/2005	\$ 13,494.00	n/a	n/a
176	Lunt Manufacturing Company	STONEHILL INSTITUTIONAL PARTNERS LP	Resolved	10/11/2005	\$ 10,000.00	n/a	n/a
178	Spring Engineering & Manufacturing Corporation	MADISON INVESTMENT TRUST SERIES 38	Resolved	10/11/2005	\$ 5,293.69	n/a	n/a
184	American Coil Spring Company, Inc.	AMERICAN COIL SPRING COMPANY	Resolved	10/12/2005	\$ 6,798.05	n/a	n/a
185	Hilite International, Inc	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/10/2005	\$ 2,422.72	n/a	n/a
186	Milliken & Company	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 202,412.11	n/a	n/a
188	Trelleborg Automotive	CONTRARIAN FUNDS LLC AS ASSIGNEE OF TRELLEBORG YSH SA DE CV/CONTRARIAN FUNDS LLC AS ASSIGNEE OF TRELLEBORG YSH INC	Resolved	10/10/2005	\$ 15,865.76	n/a	n/a
189	Otto Bock Polyurethane Technologies, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 130,000.00	n/a	n/a
191	ATF, Incorporated	ACCURATE THREADED FASTENERS INC ATF INC	Resolved	10/11/2005	\$ 71,376.60	n/a	n/a
195	Engineered Sintered Components - Hain Capital Holdings, LLC	HAIN CAPITAL INVESTORS LLC	Resolved	10/12/2005	\$ 7,443.36	n/a	n/a
200	Gobar Systems	GOBAR SYSTEMS INC	Resolved	10/12/2005	\$ 2,848.88	n/a	n/a
201	Fulton Industries, Inc.	FULTON INDUSTRIES INC	Resolved	10/12/2005	\$ 912.23	n/a	n/a
203	CTS of Canada	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 3,120.45	n/a	n/a
205	H & L Tool Company, Inc.	H & L TOOL COMPANY INC	Resolved	10/09/2005	\$ 7,344.65	n/a	n/a
206	Wamco, Inc.	AMROC INVESTMENTS LLC	Resolved	10/11/2005	\$ 63,001.69	n/a	n/a
207	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/12/2005	\$ 1,553.52	n/a	n/a
215	Chicago Rivet & Machine Company	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 1,735.38	n/a	n/a
217	Iriso USA, Inc.	AMROC INVESTMENTS LLC	Resolved	10/12/2005	\$ 58,853.42	n/a	n/a
218	GE Thermometrics, Inc.	GE INFRASTRUCTURE SENSING	Resolved	10/13/2005	\$ 42,903.31	n/a	n/a
219	Boyd Corporation	BOYD CORPORATION	Resolved	10/12/2005	\$ 16,738.79	n/a	n/a
222	Elgin Die Mold Company	LIQUIDITY SOLUTIONS INC	Resolved	10/10/2005	\$ 2,668.00	n/a	n/a
228	Illinois Tool Works	Multiple Owners	Resolved	10/12/2005	\$ 244,697.11	n/a	n/a
229	EFTEC North America	EFTEC NORTH AMERICA	Resolved	10/12/2005	\$ 14,711.99	n/a	n/a
230	AMI Industries, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 184.23	n/a	n/a
232	Metal Cladding, Inc.	METAL CLADDING INC	Resolved	10/12/2005	\$ 14,090.99	n/a	n/a
235	Assembly System Innovators	CONTRARIAN FUNDS LLC	Resolved	10/10/2005	\$ 325.80	n/a	n/a
239	Lexington Connector Seals	LEXINGTON RUBBER GROUP INC	Resolved	10/12/2005	\$ 12,451.81	n/a	n/a
241	GE Silicones	GE SILICONES	Resolved	10/13/2005	\$ 37,338.82	n/a	n/a
242	Teleflex Incorporated	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 4,315.42	n/a	n/a
244	Cherry GmbH	CHERRY GMBH	Resolved	10/11/2005	\$ 161,563.08	n/a	n/a
245	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 11,201.77	n/a	n/a
247	Chicago Rivet & Machine Co.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 822.47	n/a	n/a
249	Lexington Connector Seals	LEXINGTON RUBBER GROUP INC	Resolved	10/12/2005	\$ 28,390.99	n/a	n/a
252	Reliable Casting Corporation	RELIABLE CASTING CORP SIDNEY DIV	Resolved	10/12/2005	\$ 37,324.15	n/a	n/a
253	Master Molded Products Corporation	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 21,774.05	n/a	n/a
254	CTS Automotive Products	CTS CORPORATION	Resolved	10/11/2005	\$ 77,431.40	n/a	n/a

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255	SEPR Ceramic Beads and Powders	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 35,310.00	n/a	n/a
258	N.D.K. America, Inc.	LATIGO MASTER FUND LTD	Resolved	10/12/2005	\$ 145,267.57	n/a	n/a
259	Foster Electric (U.S.A.), Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 433.60	n/a	n/a
262	VJ TECHNOLOGIES, INC.	LONGACRE MASTER FUND LTD	Resolved	10/12/2005	\$ 60,000.00	n/a	n/a
263	Carlton-Bates Company	CARLTON BATES COMPANY	Resolved	10/11/2005	\$ 66,627.99	n/a	n/a
266	Integrated Cable Systems, Inc.	INTEGRATED CABLE SYSTEMS INC	Resolved	10/12/2005	\$ 28,105.36	n/a	n/a
267	Arrow Sheet Metal Co.	ARROW SHEET METAL PRODUCTS CO	Resolved	10/12/2005	\$ 6,367.31	n/a	n/a
269	Markel Corporation	MARKEL CORP	Resolved	10/10/2005	\$ 8,585.01	n/a	n/a
271	Hollingsworth & Vose Company	HOLLINGSWORTH & VOSE CO	Resolved	10/11/2005	\$ 5,984.96	n/a	n/a
273	Tokico (USA) Incorporated	DEUTSCHE BANK SECURITIES INC	Resolved	10/11/2005	\$ 466.56	n/a	n/a
275	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 495.50	n/a	n/a
277	Graber-Rogg, Inc.	GRABER ROGG INC	Resolved	10/11/2005	\$ 1,376.07	n/a	n/a
281	Graber Rogg, Inc.	GRABER ROGG INC	Resolved	10/12/2005	\$ 26,352.82	n/a	n/a
282	Casco Products Corporation	CASCO PRODUCTS CORPORATION	Resolved	10/05/2005	\$ 5,760.48	n/a	n/a
289	Automotive Electronic Controls	BLUE ANGEL CLAIMS LLC	Resolved	10/11/2005	\$ 3,268.34	n/a	n/a
291	Motorola	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 39,060.00	n/a	n/a
292	Stueken, LLC	HAIR CAPITAL HOLDINGS LLC	Resolved	10/11/2005	\$ 12,760.50	n/a	n/a
296	Total Component Solutions	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 900.36	n/a	n/a
297	United Plastics Group, Inc.	UNITED PLASTICS GROUP/UPC DE MEXICO S DE RL DE CV	Resolved	10/13/2005	\$ 12,681.59	n/a	n/a
305	Millenium Industries Corporation Cass City	CONTRARIAN FUNDS LLC	Resolved	10/13/2005	\$ 1,942.04	n/a	n/a
306	Emhart Teknologies	EMHART TEKNOLOGIES LLC	Resolved	10/13/2005	\$ 27,128.77	n/a	n/a
307	M & S Manufacturing	M & S MANUFACTURING COMPANY	Resolved	10/13/2005	\$ 13,620.06	n/a	n/a
308	Cataler North America Corporation	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/13/2005	\$ 18,298.73	n/a	n/a
309	Ralco Industries	LONGACRE MASTER FUND LTD	Resolved	10/11/2005	\$ 26,986.10	n/a	n/a
313	International Rectifier	INTERNATIONAL RECTIFIER CORPORATION	Resolved	10/11/2005	\$ 25,243.50	n/a	n/a
315	Stanley Electric Sales of America, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/11/2005	\$ 145,690.87	n/a	n/a
319	Panasonic Automotive Systems Company of America	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/13/2005	\$ 78,475.89	n/a	n/a
320	International Resistive Co., Inc.	INTERNATIONAL RESISTIVE COMPANY WIRE & FILM TECHNOLOGIES DIVISION/INTERNATIONAL RESISTIVE COMPANY ADVANCED FILM DIVISION/TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/13/2005	\$ 1,716.07	n/a	n/a
322	Murata Electronic North America	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/12/2005	\$ 115,579.28	n/a	n/a
323	Catalytic Solutions	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 9,345.36	n/a	n/a
328	INA USA Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF INA USA CORPORATION	Resolved	10/10/2005	\$ 32,662.29	n/a	n/a
331	Kamax S.A.U.	KAMAX SAU	Resolved	10/13/2005	\$ 1,803.58	n/a	n/a
333	Rohm and Haas Company	CABLE TECHNOLOGIESINC	Resolved	10/13/2005	\$ 18,966.38	n/a	n/a
334	Rohm and Haas Company	ROHM AND HAAS CO	Resolved	10/10/2005	\$ 25,117.91	n/a	n/a
335	TT Electronics	TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/14/2005	\$ 1,320.21	n/a	n/a
338	Graber-Rogg, Inc.	GRABER ROGG INC	Resolved	10/11/2005	\$ 2,547.30	n/a	n/a
341	Rotor Clip Company, Inc.	ROTOR CLIP COMPANY INC	Resolved	10/13/2005	\$ 14,497.86	n/a	n/a
344	Olson International Ltd.	AMROC INVESTMENTS LLC	Resolved	10/13/2005	\$ 27,979.91	n/a	n/a
345	International Resistive Company, Advanced Film Division	INTERNATIONAL RESISTIVE COMPANY WIRE & FILM TECHNOLOGIES DIVISION/TPG CREDIT OPPORTUNITIES FUND LP	Resolved	10/13/2005	\$ 77,693.93	n/a	n/a
349	Unisource Worldwide, Inc.	UNISOURCE WORLDWIDE INC	Resolved	10/12/2005	\$ 43.84	n/a	n/a
352	Taurus International Corporation	SOL - TAURUS INTERNATIONAL CORP	Resolved	10/13/2005	\$ 38,818.19	n/a	n/a
353	RBC Bearings	RBC BEARINGS	Resolved	10/13/2005	\$ 21,375.00	n/a	n/a

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354	Wright Plastic Products Co., LLC	CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 20,691.18	n/a	n/a
356	Tech Tool & Mold, Inc.	TECH TOOL & MOLD INC EFT	Resolved	10/13/2005	\$ 45,859.51	n/a	n/a
359	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 1,827.00	n/a	n/a
360	Multibase Inc.	MULTIBASE INC	Resolved	10/14/2005	\$ 4,345.60	n/a	n/a
361	CYRO INDUSTRIES	SPCP GROUP LLC	Resolved	10/14/2005	\$ 80,704.28	n/a	n/a
365	Dow Corning Corporation	DOW CORNING CORP	Resolved	10/14/2005	\$ 12,809.61	n/a	n/a
373	American Electronic Components Inc.	SIEMENS VDO AUTOMOTIVE CORPORATION ASSIGNEE OF AMERICAN ELECTRONIC COMPONENTS INC	Resolved	10/14/2005	\$ 11,006.25	n/a	n/a
374	ST MICROELECTRONICS, INC.	LONGACRE MASTER FUND LTD	Resolved	10/12/2005	\$ 153,204.95	n/a	n/a
375	Batesville Tool & Die, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 20,647.07	n/a	n/a
378	J.O. Galloup Co.	MADISON NICHE OPPORTUNITIES LLC	Resolved	10/11/2005	\$ 1,000.00	n/a	n/a
379	Kendall Electric Inc	MIDTOWN CLAIMS LLC	Resolved	10/10/2005	\$ 97,429.07	n/a	n/a
381	Silicon Laboratories, Inc.	SILICON LABORATORIES INC	Resolved	10/13/2005	\$ 9,726.81	n/a	n/a
384	ETCO Automotive Products	CONTRARIAN FUNDS LLC AS ASSIGNEE OF ETCO	Resolved	10/13/2005	\$ 1,072.80	n/a	n/a
386	Olson International, LTD.	AMROC INVESTMENTS LLC	Resolved	10/12/2005	\$ 32,874.85	n/a	n/a
391	Eaton Corp	EATON AEROQUIP DE MEXICO SA DE CV	Resolved	10/10/2005	\$ 5,813.32	n/a	n/a
393	Fujikura American, Inc.	FUJIKURA AMERICA INC	Resolved	10/14/2005	\$ 15,482.28	n/a	n/a
394	Century Mold & Tool	CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 75,000.00	n/a	n/a
396	American Molder Products	AMERICAN MOLDED PRODUCTS	Resolved	10/13/2005	\$ 498.74	n/a	n/a
400	NGK Automotive Ceramics USA, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 425,192.03	n/a	n/a
401	Linear Technology Corporation	LINEAR TECHNOLOGY CORPORATION	Resolved	10/13/2005	\$ 116,070.80	n/a	n/a
402	Tadiran Batteries	ARGO PARTNERS	Resolved	10/13/2005	\$ 11,524.40	n/a	n/a
407	Scientific Tube, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/14/2005	\$ 31,000.00	n/a	n/a
415	KARL KUEFNER, KG	HAIN CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 16,927.66	n/a	n/a
417	Stoneridge, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF STONERIDGE INC FOR ITSELF AND ET AL	Resolved	10/14/2005	\$ 12,103.66	n/a	n/a
418	Forest City Technologies, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/12/2005	\$ 9,009.31	n/a	n/a
423	Armada Rubber Manufacturing Co.	ASM CAPITAL LP	Resolved	10/08/2005	\$ 1,210.00	n/a	n/a
424	Hosiden American Corporation	FAIR HARBOR CAPITAL LLC	Resolved	10/14/2005	\$ 1,423.64	n/a	n/a
425	Marian Inc.	MARIAN INC FKA MARIAN RUBBER PRODUCTS	Resolved	10/13/2005	\$ 25,605.91	n/a	n/a
426	Acushnet Rubber Co., Inc	ACUSHNET RUBBER COMPANY INC DBA PRECIX	Resolved	10/14/2005	\$ 14,588.49	n/a	n/a
427	Eikenberry & Associates, Inc	EIKENBERRY & ASSOCIATES INC	Resolved	10/17/2005	\$ 1,530.60	n/a	n/a
428	Sinclair & Rush, Inc	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 3,491.22	n/a	n/a
429	Americhem, Inc.	AMERICHEM INC	Resolved	10/10/2005	\$ 6,797.43	n/a	n/a
430	AVX Corporation	AVX CORP	Resolved	10/13/2005	\$ 11,894.48	n/a	n/a
434	Nichicon America Corp	SPCP GROUP LLC	Resolved	10/14/2005	\$ 5,052.44	n/a	n/a
437	Sagami Amercia, Ltd.	SAGAMI AMERICA LTD	Resolved	10/14/2005	\$ 22,443.37	n/a	n/a
440	Tessier Machine Co.	TESSIER MACHINE CO	Resolved	10/13/2005	\$ 14,880.00	n/a	n/a
441	TDK Corporation	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/13/2005	\$ 172,706.22	n/a	n/a
442	Mabuchi Motor America Corp	MABUCHI MOTOR AMERICA CORP	Resolved	10/14/2005	\$ 875.54	n/a	n/a
446	Chicago Rivet	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 871.08	n/a	n/a
450	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 60,936.01	n/a	n/a
453	KOA Speer Electronics, Inc.	KOA SPEER ELECTRONICS INC	Resolved	10/10/2005	\$ 82,085.30	n/a	n/a
454	United Chemi-Con, Inc.	UNITED CHEMI CON INC	Resolved	10/10/2005	\$ 22,311.50	n/a	n/a
455	Sensus Precision Die Casting, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/17/2005	\$ 101,745.58	n/a	n/a
464	Nu Horizons Electronics Corp.	NU HORIZONS ELECTRONICS CORP	Resolved	10/11/2005	\$ 30,455.00	n/a	n/a
465	Penn Aluminum International, Inc.	PENN ALUMINUM INTERNATIONAL INC	Resolved	10/14/2005	\$ 22,680.99	n/a	n/a
466	Jideco of Bardstown, Inc.	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 6,636.00	n/a	n/a
469	Associated Spring, Barnes Group Inc.	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 37,650.77	n/a	n/a
470	Delta Products Corporation	DELTA PRODUCTS CORPORATION	Resolved	10/14/2005	\$ 12,986.67	n/a	n/a
472	Export Corporation	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/17/2005	\$ 11,691.36	n/a	n/a
474	Whirlaway Corporation	CONTRARIAN FUNDS LLC AS ASSIGNEE OF WHIRLAWAY CORPORATION	Resolved	10/17/2005	\$ 26,238.62	n/a	n/a
476	Eagle Picher Automotive - Wolverine Gasket Division	HAIN CAPITAL HOLDINGS LLC	Resolved	10/10/2005	\$ 7,994.48	n/a	n/a

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483	Capsonic Group LLC	REDROCK CAPITAL PARTNERS LLC	Resolved	10/12/2005	\$ 4,337.21	n/a	n/a
487	Hewitt Tool & Die Inc.	HEWITT TOOL & DIE INC	Resolved	10/17/2005	\$ 7,828.35	n/a	n/a
491	St. Clair Plastics Co.	CONSOLIDATED INDUSTRIAL CORP	Resolved	10/18/2005	\$ 3,795.99	n/a	n/a
492	KOSTAL Mexicana, S.A. de C.V.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/14/2005	\$ 11,188.73	n/a	n/a
497	RF Monolithics	ASM CAPITAL II LP	Resolved	10/14/2005	\$ 160,435.27	n/a	n/a
498	Breen Color Concentrates, Inc.	BREEN COLOR CONCENTRATES INC	Resolved	10/14/2005	\$ 5,107.39	n/a	n/a
501	Feintool of Cincinnati, Inc.	AMROC INVESTMENTS LLC AS ASSIGNEE OF FEINTOOL CINCINNATI INC/AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 87,992.63	n/a	n/a
503	Kostal of America, Inc	KOSTAL OF AMERICA INC/SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/14/2005	\$ 2,094.80	n/a	n/a
505	Fittings Products Co. LLC d/b/a Lake Erie Products-Livonia	SIERRA LIQUIDITY FUND LLC	Resolved	10/14/2005	\$ 4,797.32	n/a	n/a
506	LAKE ERIE PRODUCTS INC	LAKE ERIE PRODUCTS INC	Resolved	10/14/2005	\$ 14,082.57	n/a	n/a
514	Electro Dynamics Crystal Corporation	ELECTRO DYNAMICS CRYSTAL CORPORATION	Resolved	10/18/2005	\$ 2,960.00	n/a	n/a
516	Carlisle Engineered Products, Inc.	CARLISLE ENGINEERED PRODUCTS INC	Resolved	10/17/2005	\$ 168,880.61	n/a	n/a
521	Olin Corp.	BANK OF AMERICA N A	Resolved	10/10/2005	\$ 19,461.00	n/a	n/a
522	Kickhafer Manufacturing Company	KICKHAEFER MANUFACTURING CO KMC	Resolved	10/13/2005	\$ 37,150.59	n/a	n/a
526	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 903.60	n/a	n/a
528	American Aikoku Alpha, Inc.	AMERICAN AIKOKU ALPHA INC	Resolved	10/17/2005	\$ 5,823.94	n/a	n/a
530	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 4,507.28	n/a	n/a
531	Werner Co.	WERNER CO	Resolved	10/17/2005	\$ 952.91	n/a	n/a
533	CTS Corporation	CTS CORPORATION	Resolved	10/17/2005	\$ 2,258.44	n/a	n/a
536	Continental/Midland LLC	CONTINENTAL MIDLAND LLC	Resolved	10/18/2005	\$ 1,386.73	n/a	n/a
544	OMG Americas, Inc.	OMG AMERICAS INC	Resolved	10/18/2005	\$ 6,000.00	n/a	n/a
546	Pioneer N.A., Inc.	WHITEBOX HEDGED HIGH YIELD PARTNERS LP	Resolved	10/17/2005	\$ 40,059.72	n/a	n/a
552	Henkel Loctite	HENKEL CORPORATION HENKEL LOCTITE	Resolved	10/11/2005	\$ 177.36	n/a	n/a
553	Sherwin-Williams Company	SHERWIN WILLIAMS COMPANY	Resolved	10/13/2005	\$ 7,325.94	n/a	n/a
555	Dow Corning Corporation	DOW CORNING CORP	Resolved	10/17/2005	\$ 14,446.67	n/a	n/a
557	Raetech Corporation	RAETECH CORPORATION	Resolved	10/18/2005	\$ 4,500.00	n/a	n/a
577	Commodity Management Services LTD.	COMMODITY MGMT SVCS GBS PRINTED PRODS & SYS	Resolved	10/17/2005	\$ 511.95	n/a	n/a
578	Capsonic Automotive, Inc.	REDROCK CAPITAL PARTNERS LLC	Resolved	10/12/2005	\$ 2,714.88	n/a	n/a
585	EIS Inc.	EIS INC	Resolved	10/18/2005	\$ 570.00	n/a	n/a
586	Kurz-Kasch Inc.	LONGACRE MASTER FUND LTD	Resolved	10/18/2005	\$ 8,638.40	n/a	n/a
591	Pax Machine Works, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF PAX MACHINE WORKS INC	Resolved	10/18/2005	\$ 865.58	n/a	n/a
592	Hitchiner Manufacturing Co., Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF HITCHINER MANUFACTURING CO INC	Resolved	10/17/2005	\$ 8,179.67	n/a	n/a
594	Parker- Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 8,163.60	n/a	n/a
596	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 513.10	n/a	n/a
598	THE GLEASON WORKS	HAIR CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 27,955.00	n/a	n/a
605	FEDERAL SCREW WORKS	FEDERAL SCREW WORKS	Resolved	10/18/2005	\$ 4,013.35	n/a	n/a
606	Sanders Lead Co., Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 79,676.69	n/a	n/a
608	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 2,758.89	n/a	n/a
609	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 386.01	n/a	n/a
611	UNISOURCE WORLDWIDE INC	UNISOURCE WORLDWIDE INC	Resolved	10/18/2005	\$ 5,500.00	n/a	n/a
615	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/11/2005	\$ 12,642.17	n/a	n/a
617	Alegre, Inc.	ALEGRE INC	Resolved	10/18/2005	\$ 20,154.39	n/a	n/a
620	Nissinbo Automotive Corporation	REDROCK CAPITAL PARTNERS LLC	Resolved	10/18/2005	\$ 27,446.05	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
626	Micro Motion, Inc.	MICRO MOTION INC	Resolved	10/18/2005	\$ 5,895.03	n/a	n/a
628	Tessy Plastics Corporation	HAIR CAPITAL HOLDINGS LLC	Resolved	10/18/2005	\$ 9,176.58	n/a	n/a
630	Diemolding Corporation	HAIR CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 941.46	n/a	n/a
632	GCI Technologies	CONTRARIAN FUNDS LLC	Resolved	10/18/2005	\$ 5,981.92	n/a	n/a
641	Veritas Software Corporation	VERITAS SOFTWARE CORPORATION	Resolved	10/19/2005	\$ 7,909.10	n/a	n/a
642	ITT Industries, Inc.	ITT CANNON NEWTON	Resolved	10/18/2005	\$ 11,604.80	n/a	n/a
644	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 898.38	n/a	n/a
645	Camoplast Thermoplastic Group	CONTRARIAN FUNDS LLC AS ASSIGNEE OF CAMOPLAST INCORPORATED	Resolved	10/14/2005	\$ 88,544.81	n/a	n/a
652	Optrex America Inc.	OPTREX AMERICA INC	Resolved	10/20/2005	\$ 25,974.39	n/a	n/a
653	Precision Resource, Inc.	PRECISION RESOURCE INC KY DIV	Resolved	10/20/2005	\$ 13,539.00	n/a	n/a
657	Phillips Plastics Corporation	CONTRARIAN FUNDS LLC	Resolved	10/18/2005	\$ 9,001.06	n/a	n/a
661	Maxim Integrated Products, LLC.	MAXIM INTEGRATED PRODUCTS INC	Resolved	10/18/2005	\$ 22,730.81	n/a	n/a
662	Trelleborg Palmer Chenard	SOL - TRELLEBORG PALMER CHENARD	Resolved	10/18/2005	\$ 3,477.60	n/a	n/a
665	United Machining, Inc.	UNITED MACHINING INC	Resolved	10/17/2005	\$ 1,532.85	n/a	n/a
668	HITACHI AUTOMOTIVE PRODUCTS	DEUTSCHE BANK SECURITIES INC	Resolved	10/18/2005	\$ 27,569.59	n/a	n/a
678	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 1,819.75	n/a	n/a
679	Millwood, Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 300.00	n/a	n/a
684	Millwood Inc.	MILLWOOD INC DBA LIBERTY INDUSTRIES INC	Resolved	10/13/2005	\$ 2,000.00	n/a	n/a
695	Gemini Group, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SIERRA PLASTICS INC AKA SIERRA EL PASO/CONTRARIAN FUNDS LLC AS ASSIGNEE OF GEMINI PLASTICS INC	Resolved	10/14/2005	\$ 14,138.65	n/a	n/a
697	Diodes Incorporated	DIODES INCORPORATED	Resolved	10/18/2005	\$ 1,421.23	n/a	n/a
701	Parker-Hannifin Corporation, Parker Seals	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 3,621.90	n/a	n/a
703	Wakefield Thermal Solutions	WAKEFIELD THERMAL SOLUTIONS	Resolved	10/18/2005	\$ 186.68	n/a	n/a
707	Midwest Stamping, Inc.	MIDWEST STAMPING INC	Resolved	10/20/2005	\$ 1,242.18	n/a	n/a
719	Electronic Services, LLC, d.b.a. CSI Electronics	CONTRARIAN FUNDS LLC AS ASSIGNEE OF ELECTRONIC SERVICES LLC DBA CSI ELECTRONICS	Resolved	10/20/2005	\$ 29,610.00	n/a	n/a
723	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 429.53	n/a	n/a
725	Avnet, Inc.	AVNET INC	Resolved	10/20/2005	\$ 67,613.23	n/a	n/a
728	Security Plastics Division/NMC, LLC	CONTRARIAN FUNDS LLC AS ASSIGNEE OF SP DIV NMC LLC	Resolved	10/18/2005	\$ 5,367.21	n/a	n/a
729	Contrarian Capital Management LLC	BANK OF AMERICA N A/CONTRARIAN FUNDS LLC	Resolved	10/14/2005	\$ 57,484.77	n/a	n/a
732	Photo Stencil, LLC	CONTRARIAN FUNDS LLC	Resolved	10/20/2005	\$ 5,295.00	n/a	n/a
747	Standard Microsystems Corporation	STANDARD MICROSYSTEMS CORPORATION	Resolved	10/20/2005	\$ 19,067.40	n/a	n/a
753	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 19,657.49	n/a	n/a
756	Fujikoki America, Inc.	SPECIAL SITUATIONS INVESTING GROUP INC	Resolved	10/13/2005	\$ 102,600.39	n/a	n/a
758	Parker- Hannifin, Eng.Seals Division	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/14/2005	\$ 3,679.78	n/a	n/a
765	United Stars Industries, Inc.	CONTRARIAN FUNDS LLC AS TRANSFEREE OF UNITED STARS INDUSTRIES INC	Resolved	10/24/2005	\$ 11,853.70	n/a	n/a
768	NMB Technologies Corporation	LONGACRE MASTER FUND LTD	Resolved	10/20/2005	\$ 4,056.80	n/a	n/a
771	Engelhard Corporation	BLUE ANGEL CLAIMS LLC	Resolved	10/11/2005	\$ 85,576.07	n/a	n/a
772	Premier Products, Inc.	CONTRARIAN FUNDS LLC	Resolved	10/17/2005	\$ 10,671.05	n/a	n/a
775	CoorsTek, Inc.	COORSTEK INC	Resolved	10/10/2005	\$ 30,318.20	n/a	n/a
776	KL Industries, Inc.	ARGO PARTNERS	Resolved	10/14/2005	\$ 4,872.55	n/a	n/a
779	MacArthur Corporation	JPMORGAN CHASE BANK NA	Resolved	10/13/2005	\$ 154,170.00	n/a	n/a
782	Parker Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 47,748.95	n/a	n/a
786	Wako Electronics (USA) Inc.	AMROC INVESTMENTS LLC	Resolved	10/14/2005	\$ 4,244.00	n/a	n/a
795	Phillips Optical Storage	LATIGO MASTER FUND LTD	Resolved	10/12/2005	\$ 34,369.12	n/a	n/a
797	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/17/2005	\$ 339.51	n/a	n/a
798	GKN Sinter Metals Limited	DEUTSCHE BANK SECURITIES INC	Resolved	10/17/2005	\$ 11,600.00	n/a	n/a
800	Philips Semiconductors, Inc.	SPCP GROUP LLC AS AGENT FOR SILVER POINT CAPITAL FUND LP AND SILVER POINT CAPITAL OFFSHORE FUND LTD	Resolved	10/12/2005	\$ 194,274.52	n/a	n/a

Exhibit A

Reclamation Claim Number	Party Asserting Reclamation Demand	Current Holder of Reclamation Claim	Status of Reclamation Claim	Demand Date	Agreed-Upon Amount	Supplier Demand Amount	Delphi Reconciled Amount
802	Mobile Display Systems	MOBILE DISPLAY SYSTEMS	Resolved	10/14/2005	\$ 25,930.54	n/a	n/a
804	Tal-Port Industries, LLC/Stonehill Institutional Partners L.P.	STONEHILL INSTITUTIONAL PARTNERS LP	Resolved	10/14/2005	\$ 30,013.94	n/a	n/a
805	Speedline Technologies, Inc.	TPG CREDIT OPPORTUNITIES INVESTORS LP	Resolved	10/19/2005	\$ 189,005.00	n/a	n/a
807	Assembleon America, Inc.	LATIGO MASTER FUND LTD	Resolved	10/21/2005	\$ 13,170.09	n/a	n/a
811	Schleuniger, Inc.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 15,470.75	n/a	n/a
816	Northern Engraving Corporation	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 35,503.86	n/a	n/a
817	PD George Co.	LONGACRE MASTER FUND LTD	Resolved	10/18/2005	\$ 4,723.53	n/a	n/a
818	Seal Design, Inc.	LONGACRE MASTER FUND LTD	Resolved	10/20/2005	\$ 1,388.63	n/a	n/a
820	Futaba Corporation of America	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/11/2005	\$ 197,369.77	n/a	n/a
823	Rosemount Analytical	ROSEMOUNT ANALYTICAL	Resolved	10/20/2005	\$ 1,340.00	n/a	n/a
824	Viking Plastics	ASM CAPITAL LP	Resolved	10/11/2005	\$ 5,547.35	n/a	n/a
826	Worthington Precision Metals, Inc.	SOL - WORTHINGTON PRECISION METALS INC	Resolved	10/14/2005	\$ 23,230.90	n/a	n/a
829	MN Corporation	MADISON INVESTMENT TRUST SERIES 38	Resolved	10/12/2005	\$ 25,163.47	n/a	n/a
832	Omron Dualtec Automotive Electronics, Inc.	CONTRARIAN FUNDS LLC AS ASSIGNEE OF OMRON DUALTEC AUTOMOTIVE ELECTRONICS INC	Resolved	10/11/2005	\$ 85,411.74	n/a	n/a
834	CTS Corporation	CTS CORPORATION	Resolved	10/10/2005	\$ 49,457.69	n/a	n/a
836	AVM, Inc.	AVM INDUSTRIES LLC	Resolved	10/12/2005	\$ 1,988.61	n/a	n/a
838	Daishinku (America) Corp. d/b/a KDS America	DAISHINKU AMERICA CORP DBA KDS AMERICA	Resolved	10/17/2005	\$ 15,181.24	n/a	n/a
840	Coats American, Inc.	COATS AMERICAN INC	Resolved	10/14/2005	\$ 3,170.89	n/a	n/a
841	Alps Automotive, Inc.	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/18/2005	\$ 37,893.60	n/a	n/a
843	First Technology Holdings, Inc.	FIRST TECHNOLOGY HOLDINGS INC AND AFFILIATES AND SUBSIDIARIES AND CONTROL DEVICES INC AND FIRST INERTIA SWITCH LIMITED	Resolved	10/16/2005	\$ 23,525.65	n/a	n/a
849	Dell Receivables	DELL INC	Resolved	10/18/2005	\$ 12,218.83	n/a	n/a
852	Texas Instruments	BEAR STEARNS INVESTMENT PRODUCTS INC	Resolved	10/17/2005	\$ 64,270.14	n/a	n/a
857	CTS Automotive Products	CTS CORPORATION	Resolved	10/10/2005	\$ 3,735.50	n/a	n/a
858	Micronas	MICRONAS GMBH	Resolved	10/27/2005	\$ 18,090.00	n/a	n/a
859	Precision Fitting and Gauge Co.	PRECISION FITTING & GAUGE CO	Resolved	10/27/2005	\$ 892.00	n/a	n/a
863	NSK Corporation	LONGACRE MASTER FUND LTD	Resolved	10/13/2005	\$ 26,521.34	n/a	n/a
864	Coilcraft Inc.	COILCRAFT INC	Resolved	10/12/2005	\$ 4,434.68	n/a	n/a
865	PlastiCert	ARGO PARTNERS	Resolved	10/18/2005	\$ 9,978.00	n/a	n/a
867	Schleuniger	HAIN CAPITAL HOLDINGS LLC	Resolved	10/21/2005	\$ 17,095.00	n/a	n/a
869	Transfer Tool Products, Inc.	TRANSFER TOOL PRODUCTS INC	Resolved	10/13/2005	\$ 1,186.74	n/a	n/a
883	Fujitsu Components America, Inc.	FUJITSU COMPONENTS AMERICA INC	Resolved	10/27/2005	\$ 2,018.40	n/a	n/a
884	Parker Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 3,151.81	n/a	n/a
887	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 339.94	n/a	n/a
888	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/17/2005	\$ 998.52	n/a	n/a
889	Parker-Hannifin Corporation	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/11/2005	\$ 10,551.65	n/a	n/a
892	Parker Seals	SPCP GROUP LLC AS ASSIGNEE OF PARKER HANNIFIN CORPORATION	Resolved	10/16/2005	\$ 1,787.81	n/a	n/a
904	The Lighting Company	THE LIGHTING COMPANY	Resolved	10/14/2005	\$ 791.97	n/a	n/a
905	DuPont Powder Coatings LLC	LONGACRE MASTER FUND LTD	Resolved	10/10/2005	\$ 8,317.35	n/a	n/a
908	Universal Bearings, Inc.	GOLDMAN SACHS CREDIT PARTNERS LP	Resolved	10/07/2005	\$ 153.83	n/a	n/a
911	Metal Surfaces, Inc.	HAIN CAPITAL HOLDINGS LLC	Resolved	10/14/2005	\$ 14,486.60	n/a	n/a
915	Engineered Materials Solutions	HAIN CAPITAL HOLDINGS LLC	Resolved	10/17/2005	\$ 43,198.89	n/a	n/a
916	Key Safety Systems, Inc.	KEY SAFETY SYSTEMS & SUBSIDIARIES	Resolved	10/14/2005	\$ 3,803.60	n/a	n/a

\$ 16,181,727.91 \$ 18,802,421.99